UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
_____

ALVIN BALDUS, CINDY BARBERA,
CARLENE BECHEN, RONALD BIENDSEIL,
RON BOONE, VERA BOONE, ELVIRA BUMPUS,
EVANJELINA CLEEREMAN, SHEILA COCHRAN,
LESLIE W. DAVIS III, BRETT ECKSTEIN,
MAXINE HOUGH, CLARENCE JOHNSON,
RICHARD KRESBACH, RICHARD LANGE,
GLADYS MANZANET, ROCHELLE MOORE,
AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS,
JEANNE SANCHEZ-BELL, CECELIA SCHLIEPP,
and TRAVIS THYSSEN,

      Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE,
and RONALD KIND,

      Intervenor-Plaintiffs,

  v.   File No. 11-CV-562

Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:
MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,
_____

[Caption Continued]

DEPOSITION

DAVID J. MEYER

Madison, Wisconsin
January 25, 2012

Sarah Finley Pelletter,
Registered Professional Reporter

2

and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

      Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

      Intervenor-Defendants.

_____

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA WARA,
JOSE PEREZ, and ERICA RAMIREZ,

      Plaintiffs,

  v.   Case No. 11-CV-1011
                       JPS-DPW-RMD
Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:
MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,
and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

      Defendants.

_____

4

(Exhibit Nos. 86 and 87 were attached to the original
    transcript and copies were provided to counsel.
Copies of Exhibit Nos. 79 and 80 were attached to the
    original transcript and provided to counsel)

**(The original deposition transcript was filed with
        Attorney Douglas M. Poland)**

3

      DEPOSITION of DAVID J. MEYER, a witness
of lawful age, taken on behalf of the Plaintiffs,
wherein Alvin Baldus, et al., are Plaintiffs, and
Members of the Wisconsin Government Accountability
Board, et al., are Defendants, pending in the
United States District Court for the Eastern District
of Wisconsin, pursuant to notice, before
Sarah Finley Pelletter, a Registered Professional
Reporter and Notary Public in and for the State of
Wisconsin, at the offices of Lawton & Cates, S.C.,
Attorneys at Law, Ten East Doty Street, Suite 400, in
the City of Madison, County of Dane, and State of
Wisconsin, on the 25th day of January 2012,
commencing at 9:03 in the forenoon.

               A P P E A R A N C E S

DOUGLAS M. POLAND, Attorney,
for GODFREY & KAHN, S.C., Attorneys at Law,
    One East Main Street, Suite 500, Madison,
    Wisconsin 53703, appearing on behalf of
    Plaintiffs Alvin Baldus, et al.

JACQUELINE BOYNTON, Attorney at Law,
    2266 North Prospect Avenue, Suite 505,
    Milwaukee, Wisconsin 53202, appearing on behalf
    of Plaintiffs Voces De La Frontera, Inc., et
    al.

4

1 of 56 sheets
Case 2:11-cv-00562-JPS-DPW-RMD Filed 02/20/12 Page 1 of 56 Document 172
WWW.FORTHERECORDMADISON.COM   (608) 833-0392
Page 1 to 4 of 149

Page 5

```
 1         A P P E A R A N C E S  (Continued)
 2
     P. SCOTT HASSETT, Attorney,
 3   for LAWTON & CATES, S.C., Attorneys at Law,
           Ten East Doty Street, Suite 400, Madison,
 4         Wisconsin 53703, appearing on behalf of the
           Intervenor-Plaintiffs.
 5
 6   MARIA S. LAZAR, Assistant Attorney General,
     for STATE OF WISCONSIN DEPARTMENT OF JUSTICE,
 7         17 West Main Street, Madison, Wisconsin 53703,
           appearing on behalf of the Defendants.
 8
 9   DANIEL KELLY, Attorney,
     for REINHART BOERNER VAN DEUREN S.C.,
10         Attorneys at Law, 1000 North Water Street,
           Suite 2100, Milwaukee, Wisconsin 53202,
11         appearing on behalf of the Defendants.
12
     KELLEN C. KASPER, Attorney,
13   for FOLEY & LARDNER, LLP, Attorneys at Law,
           777 East Wisconsin Avenue, Milwaukee,
14         Wisconsin 53202, appearing on behalf of the
           Intervenor-Defendants.
15
16   Also Present:  Kenneth R. Mayer, Professor
17
                    _____
18
19              DAVID J. MEYER,
20      called as a witness, being first duly sworn,
21      testified on oath as follows:
22
23              EXAMINATION
24   By Mr. Poland:
25   Q  Could you state your name for the record please.
```

Page 6

```
 1   A  David Meyer.
 2   Q  And, Mr. Meyer, what do you do?
 3   A  I'm a project manager at the Government
 4      Accountability Board.
 5   Q  Do you have, as a project manager, do you have any
 6      specific or particular duties or responsibilities?
 7   A  Yes, I do.
 8   Q  What are those?
 9   A  I'm the project manager for the redistricting
10      efforts and the voter ID efforts.
11   Q  And today we're not going to concern ourselves at
12      all --
13   A  Sorry.  From a technical perspective.
14   Q  Today we're not going to be talking about voter
15      ID, we're just going to be talking about the
16      redistricting efforts.  Have you given a
17      deposition before?
18   A  I have not.
19   Q  Then let me just go over a couple of what we'll
20      call ground rules here.  Number one, I'll be
21      asking questions.  After I'm done asking
22      questions, there will be an opportunity for other
23      counsel at the table to ask you questions as well.
24      So we'll ask the questions.  You will give
25      answers.  And the court reporter, who is sitting
```

Page 7

```
 1      over here to your left, is taking down the
 2      questions and the answers.
 3         There also are other counsel at the table who
 4      can object to questions that I ask, and so if they
 5      object to a question, unless your counsel or the
 6      attorneys here who are representing the defendants
 7      instruct you not to answer a question, you need to
 8      answer the question.  If you can't answer a
 9      question, if you need me to rephrase it, if you
10      don't understand what I'm asking, just let me know
11      that, and I'll be happy to rephrase it for you.  I
12      don't think we're going to go terribly long today,
13      but if you do need a break, let me know, and we
14      can always take a break.
15         The purpose of the deposition, as I had said
16      before we went on the record today, is a little
17      bit different than many other depositions.  We're
18      trying to get a handle on some specific things
19      that I've identified in the letter, and I'm going
20      to show you that letter in just a little bit and
21      we'll kind of walk through those.  But it really
22      is to get the information that we've asked for in
23      that particular letter.  Okay?
24   A  (Indicating)
25   Q  Before we start -- strike that.  I'd like to ask
```

Page 8

```
 1      you, first of all, have you received a copy of a
 2      deposition notice --
 3   A  I have.
 4   Q  -- for today's deposition?
 5             (Exhibit No. 86 marked for
 6              identification)
 7   Q  All right.  Mr. Meyer, I've given you a copy of a
 8      document that the court reporter has marked as
 9      Deposition Exhibit No. 86.  You'll see the first
10      two pages, two sheets, at least, consist of a
11      letter, and then it goes on and there's a notice
12      of deposition after that.  Do you see that?  Where
13      it says notice of deposition?  I think you need to
14      turn the page.
15   A  Next page?  Yes, I do.
16   Q  Okay.  And if you turn to -- in the notice of
17      deposition, I'm going to refer to the page numbers
18      at the bottom.  If you look on page 2 and then
19      continuing on to page 3, the notice is for the
20      deposition of a representative of the Wisconsin
21      Government Accountability Board to testify on
22      seven different topics or matters that are
23      identified in Exhibit 86.  Do you see those?
24   A  I do.
25   Q  All right.  Are you the representative of the
```

Page 9

1 Government Accountability Board who's been
2 designated to testify today on those specific
3 issues?
4 A Yes, I am.
5 Q Terrific. Before I get into each of these areas,
6 I wanted to ask you just a little bit more about
7 what you do in your role. Okay? When did you
8 start working as a project manager for the GAB?
9 A September 12, 2011.
10 Q When you were hired on September 12th -- strike
11 that question. Were you hired on September 12th
12 or was that the first day that you actually
13 started working?
14 A That was the first day I started working.
15 Q At the point that you had already started working,
16 the redistricting legislation Acts 43 and 44
17 already had been passed; isn't that correct?
18 A That's my understanding.
19 Q What were you hired specifically to do with
20 respect to redistricting?
21 A I was hired to lead the technical implementation
22 of the redistricting project within the Statewide
23 Voter Registration System.
24 Q And within that specific role that you were hired
25 to play, were you given any particular tasks or

Page 10

1 was it left to you to develop what you needed to
2 do to implement it?
3 A As a project manager, I was given, you know, my
4 responsibilities to make sure the project gets
5 done on time, on budget and scope, you know,
6 typical project manager things. Specifically,
7 tasks were to implement redistricting within the
8 Statewide Voter Registration System. A lot of
9 that, from a technical perspective, was left up to
10 the technical team to determine those
11 implementation tasks.
12 Q And when you say the technical team, is that a
13 team that reports to you or works under you?
14 A That is correct.
15 Q And because you started in September, you did not
16 play any role in the redistricting process itself
17 up until that time, correct?
18 A That is correct.
19 Q So in the creation of Acts 43 and 44, and the
20 determination of the boundaries for legislative
21 and congressional districts, that is not something
22 that you played a role in creating, right?
23 A That is correct.
24 Q What did you do initially to start to implement
25 the redistricting process?

Page 11

1 A First things I started to do was understand, you
2 know, what the requirements of the project were,
3 what were the things that we needed to implement
4 within the Statewide Voter Registration System to
5 implement the redistricting for voting and
6 election management purposes.
7 Q And you mentioned the Statewide Voter Registration
8 System a couple of times now. Can you describe
9 please what that is?
10 A Yes. The Statewide Voter Registration System is
11 the system that local and -- local municipalities
12 and county clerks use to administer elections. It
13 keeps track of voter registrations, absentee
14 ballots, typical things that would go into any
15 type of an election from a local school district
16 type of an election all the way, you know, through
17 a statewide election.
18 Q And if we refer to SVRS, you'll understand that's
19 referring to the Statewide Voter Registration
20 System?
21 A Yes.
22 Q Are the data on SVRS maintained by addresses or
23 are they maintained by some type of geolocation
24 measure like GIS coordinates?
25 A Can you rephrase that?

Page 12

1 Q Sure. Let me ask you the question. How are the
2 voter data maintained within the SVRS, how are
3 they recorded?
4 A Voters are recorded, when they fill out an
5 application, their address is stored in SVRS as
6 their local domicile for voting, so it identifies
7 them where the districts that they're
8 responsible -- or where they can vote within those
9 districts.
10 Q So the SVRS for every voter, you, me, anyone who's
11 a voter in Wisconsin, has their address and that's
12 associated with their name; is that correct?
13 A That is correct.
14 Q Is there any kind of geolocational measurement
15 that's used also in the SVRS such as a GIS
16 coordinate for where that voter's address is
17 located?
18 A Yes, there is.
19 Q And what unit of measure is used?
20 A We use a decimal-based geocoding, projected in the
21 WGS84 format.
22 Q The geocoding that's used for the SVRS then, does
23 it rely on any kind of data from the Census, the
24 U.S. Census in any way?
25 A From a voter registration perspective?

Page 13

1 Q From an address perspective.
2 A From an address perspective, no, it does not.
3 Q So it really exists separate and apart from the
4   census data?
5 A That is correct.
6 Q Now, once you understood the requirements of the
7   project in terms of what you had with the SVRS,
8   what did you do then to start to implement or
9   start to -- strike that question. After you
10   understood initially the requirements of the
11   project, what did you do next?
12 A The next step we took is we designed changes to
13   the SVRS to incorporate new districts based upon
14   redistricting. After that, we took those
15   addresses that are currently for all registered
16   voters or active registered voters in SVRS,
17   cleansed those addresses to USPS standard, so we
18   did a period of making sure that the addresses all
19   were in a standard format, sent those standard
20   addresses through a geocoding service, to get an
21   accurate latitude and longitude, and stored that
22   latitude and longitude with those addresses.
23 Q So, and let me stop you there just a minute. All
24   right. So when -- I think I got your testimony
25   right. You said you designed changes to the SVRS

Page 14

1   to incorporate new districts; is that right?
2 A That is correct.
3 Q So approximately when did you start that step?
4 A The design actually was started before I started
5   at the GAB. So it was in progress when I had
6   started there.
7 Q And that was something that was handled by the GAB
8   itself?
9 A That was, it was handled by technical
10   representatives at the GAB prior to my arrival.
11 Q Do you know who did that at the GAB, who performed
12   that?
13 A David Grassel was the lead for the technical team.
14 Q Is David still with the GAB?
15 A Yes, he is.
16 Q So that had begun before the time that you
17   started, right?
18 A Correct.
19 Q So what did you do then when you came in to
20   design -- to help design changes?
21 A So we designed our -- finished up the design of
22   the system, and we made a change in the system to
23   change from going from address ranges, which is
24   how voters were previously assigned to districts,
25   to using mapping or GIS-based shapefiles.

Page 15

1 Q Was this the first time that that had been done in
2   Wisconsin?
3 A To my knowledge, yes.
4 Q So this was all new for the redistricting this
5   year in 2011, as far as you know?
6 A That is correct.
7 Q Once this is done, will it need to be redone in
8   another ten years every time, or does this give,
9   if a voter doesn't change an address, is that
10   then -- does that remain for the next go-around in
11   ten years?
12 A The geocode of that address never changes. What
13   would change in ten years is the boundaries of
14   what those districts are defined as. So yes,
15   every ten years you'd have to go through that
16   process of changing the district boundaries.
17 Q Now, when you designed the changes to the SVRS to
18   incorporate the new districts, was there any part
19   of changing the SVRS that included work with the
20   district boundaries themselves?
21 A Not within SVRS, no. We received those district
22   boundaries from LTSB.
23 Q And that's because the SVRS just has voter
24   information, right, not district boundary
25   information?

Page 16

1 A That is correct.
2 Q And you mentioned that you received the district
3   boundaries from LTSB?
4 A That is correct.
5 Q And we're going to focus specifically here today
6   just on assembly district, senate district, and
7   congressional district boundaries, okay? Do you
8   understand that?
9 A Yes, I do.
10 Q So we're not going to talk about some of the other
11   local boundaries that might exist. The wards
12   might come into it a little bit, but that's sort
13   of attendant to the specific boundaries that we're
14   concerned with.
15 A Okay.
16 Q When did you get the district boundaries from the
17   LTSB?
18 A Specific date, I don't recall. It was in October.
19   Mid-October, probably.
20 Q How were the district boundaries transmitted to
21   you in terms of the kind of format or information
22   they were transmitted to you in?
23 A Specifically with the legislative, congressional,
24   and senate boundaries, those were uploaded to the
25   LTSB website where we acquired them or downloaded

1 them from.	1 Q And what did you receive back from Microsoft Bing?
2 Q And what kind of informational or data format were	2 A What we did is we took groups or batches of those
3 those boundaries in?	3 addresses, sent them to the Bing geocoding
4 A We quantify it as GIS dot shp or shapefiles, with	4 service, and what we received back was a latitude
5 an associated projection of those files.	5 and longitude of that address.
6 Q When you say an associated projection of those	6 Q What did you do then with the latitude and
7 files, what do you mean?	7 longitude for each address that you received back?
8 A Projected in the WGS84 format.	8 A Stored that in the SVRS database.
9 Q What is that format, just generally?	9 Q So the geolocational data for each address in the
10 A It's, in GIS terms, there's a lot of different	10 SVRS database then was produced in the manner you
11 ways that you can format a projection. WGS84 is a	11 just described?
12 global standard that's used by numerous parties,	12 A For a majority of the addresses, that is correct.
13 census being one of them, Google Bing, so if you	13 Q I take it from your answer then that there was
14 go to like Google Maps, those maps are projected	14 some other method used for some number of the
15 in WGS84.	15 addresses in the SVRS database other than through
16 Q Do you know how the district boundaries that the	16 the Bing service?
17 LTSB had provided themselves were created?	17 A That is correct.
18 A I do not.	18 Q And how was that done?
19 Q Do you know whether they were, those boundaries	19 A Through local or county-based GIS services. We
20 themselves were based on any specific data, such	20 sent them those cleansed addresses to certain
21 as census data?	21 municipalities or county GIS, which also stores
22 A I do know that they were based upon census block	22 latitude and longitude information for, primarily
23 data.	23 for their E911 systems, and they were able to send
24 Q Once you had designed the changes to the SVRS, you	24 us back latitude and longitude, that in some cases
25 mentioned that you took all the addresses within	25 was more accurate than what Bing could provide.
17	19
1 the SVRS and you cleansed them to a standard	1 Q How did you make a determination to go to the
2 format; is that correct?	2 local or county representatives or officials to
3 A That is correct.	3 get those GIS coordinates as opposed to using
4 Q And so what does that entail?	4 Bing?
5 A We purchased software called Zip plus 4, a	5 A Municipal or county clerks would recommend or work
6 software provided through the USPS or through a	6 with their local GIS and would request that of us.
7 subsidiary of them, that includes a database	7 Q So they actually made the requests to use their
8 that's updated monthly of every address, mailing	8 own data, the municipal or county data, as opposed
9 address within the United States.	9 to the Bing data, it came from the clerks in those
10 Q And that's really primarily a formatting step to	10 areas themselves?
11 put them into a common format?	11 A That is correct.
12 A That is correct.	12 Q Is there a list that GAB has of the municipal or
13 Q And then you testified that you sent those	13 county clerks who made that request themselves?
14 addresses to a geocoding service?	14 A There's no current list.
15 A That is correct.	15 Q So if we were to go through the SVRS database and
16 Q When did you do that?	16 we were to look at the geolocational information
17 A That was done in September/October time frame.	17 for each voter who appears on there, we wouldn't
18 Q Who is the geocoding service that those addresses	18 be able to tell which voter's location or
19 in the SVRS was sent to?	19 geolocation was generated by the Bing process or
20 A The primary geocoding service that we used was	20 by the process of going to the municipal or county
21 Microsoft Bing.	21 clerks?
22 Q So it's not just a search engine, it actually is a	22 A That is correct, yeah, not through SVRS.
23 service?	23 Q And there's no list that the GAB has of whether --
24 A They actually have services for mapping features	24 of which municipal and local clerks submitted the
25 that you can purchase.	25 coordinates that were used for SVRS and which ones
18	20

Case 2:11-cv-00562-JPS-DPW-RMD   Filed 02/20/12   Page 5 of 56   Document 172

1   came from the Bing system?
2 A There is no list of that. It could be generated
3   though.
4 Q Now, once you had all of these addresses in the
5   SVRS with a geocode for their locations, what was
6   the next step in your process for implementing
7   redistricting?
8 A We received ward boundaries from LTSB. Those were
9   provided from the LTSB through their FTP site.
10 Q And when did that occur?
11 A October.
12 Q What was the purpose of getting the ward
13   boundaries from the LTSB?
14 A The core of SVRS from a boundary or from an
15   election administration perspective is wards.
16   Wards make up our municipal districts. They make
17   up our congressional, legislative, and senate
18   districts, for the most part. They make up county
19   supervisor districts, aldermanic districts, so
20   they're the base district that is within SVRS.
21   There is another base district, which is like a
22   school district or a sanitary district, that can
23   create a split of that ward, and we call those
24   district combos.
25 Q Splits, so if there is a ward that's split between
                        21

1   two districts, do you call that a ward combo?
2 A If it's split between two districts that the ward
3   doesn't make up. For example, a school district
4   could split a ward, and that would be called a
5   separate district combo. So you could have two
6   school districts within the same ward.
7 Q I see. What about, do you ever have a situation
8   where a ward is split between two legislative
9   districts, assembly districts, or congressional
10   districts?
11 A Normally, no. But with, in regards to LTSB, I had
12   identified 115 to 120 -- I don't recall the number
13   exactly -- wards that could be legally split by
14   those districts, and we received that list from
15   LTSB.
16 Q Do you refer -- did you refer to those as combos
17   as well?
18 A We referred to those as split wards.
19 Q Split wards, okay.
20 A And they would create a different district combo,
21   correct.
22 Q And I'm just trying to get an idea of the
23   language. I've looked at a couple of memos and
24   seen different language, and we'll look at those,
25   and I just want to try to get a general idea of
                        22

1   the terminology that you're using.
2 A Okay.
3 Q When you received the ward boundaries from the
4   LTSB, what did you do with that information?
5 A We take the ward boundaries, ensure that those are
6   projected in WGS84 format so that the projections
7   within those boundaries are correct. We then take
8   those shapefiles, upload those into our database,
9   and they become the ward boundaries for those
10   districts.
11 Q When you say uploaded into your database, what
12   database is that you're referring to?
13 A The SVRS database.
14 Q So then are the ward boundaries associated with
15   each of the individual voters that are in the
16   SVRS?
17 A The associated voters are assigned to a ward but
18   through a district combo.
19 Q So they're assigned to a ward within the SVRS,
20   each address of each voter?
21 A That is correct.
22 Q Now, when you say through a district combo, what
23   do you mean by that?
24 A So a voter would be assigned to a district combo.
25   So if a ward was split by a school district, that
                        23

1   voter's address would be assigned to that specific
2   district combo split.
3 Q So they are assigned to not only a ward but
4   they're also assigned to a school district, for
5   example?
6 A Correct.
7 Q Are they also assigned to an assembly, a senate,
8   and a congressional district within the SVRS?
9 A That is correct.
10 Q All right. Once you had assigned -- once you had
11   included the ward boundaries and uploaded that
12   information into the SVRS, what was the next step
13   in the redistricting process?
14 A The next step would be to generate those district
15   combos and assign those district combos to those
16   voter addresses.
17 Q And that's what we just talked about --
18 A Correct.
19 Q -- and is now maintained with the SVRS?
20 A That is correct.
21 Q And is there another process -- strike that
22   question. Is there anything else then that's done
23   with the SVRS with respect to importing or
24   including any additional information?
25 A There is additional steps that are taken after
                        24

Case 2:11-cv-00562-JPS-DPW-RMD   Filed 02/20/12   Page 6 of 56   Document 172

25

1   that. Clerks have been going through a process of
2   ensuring that those district boundaries,
3   specifically district combo boundaries, are
4   correct, ensuring that the voters' addresses that
5   have been geocoded have an accurate geocode,
6   ensuring that those voters' addresses that have
7   been geocoded are in the correct districts. We
8   have a number of what we term exceptions, one
9   being geocode; another being a boundary exception,
10   meaning the clerk would have to look at the
11   boundaries and the voters placed along those
12   boundaries within plus or minus 50 meters of the
13   boundary to ensure that the geocode placed that
14   voter into the correct district.
15 Q All right. The exceptions that you just referred
16   to, are those what I think has been referred to in
17   some memos I've seen from the GAB as anomalies?
18 A Those are different exceptions.
19 Q All right. So just to make sure I understand the
20   exceptions that you were just testifying to a
21   minute ago, can you repeat those again, what those
22   exceptions are?
23 A Sure. There are a number of different exceptions
24   that we advise clerks to go through to ensure that
25   their voters are districted correctly. One being

26

1   a geocode exception. That type of exception would
2   be if the geocode for that address was inaccurate
3   or unavailable. A second would be a boundary
4   exception. Boundary exceptions are those
5   addresses within plus or minus 50 meters of any
6   district combo boundary. The clerk would have to
7   go through -- or they are going through the system
8   and evaluating to make sure that that, number one,
9   boundary is correct, number two, that that voter
10   is placed in the correct district.
11   Other types of exceptions would be what we
12   call a school district exception, which would --
13   identifies those voters that had changed school
14   districts from previous to when we implemented the
15   redistricting maps. And I think there's one more
16   type of exception.
17   Oh, the other type of exception would be like
18   a municipal boundary exception, meaning when we
19   geocoded that voter, we geocoded them into a
20   municipality that is not where they're registered,
21   and we flag those as what we term DC1s or voters
22   with no district combo.
23 Q So those exceptions then are sent back to the
24   local clerks, to the county or the municipal
25   clerks to reconcile; is that correct?

27

1 A That is correct. The clerks use SVRS and the
2   tools within SVRS to assess those exceptions and
3   make a decision on how to correct them.
4 Q Is that a process that has been completed or is
5   that ongoing now?
6 A That's currently ongoing.
7 Q Have you received back responses from clerks of
8   any of the municipalities or counties with respect
9   to reconciling those exceptions you just testified
10   to?
11 A Yes, we have.
12 Q How many municipal or county clerks have you heard
13   back from in reconciling those anomalies -- I'm
14   sorry, reconciling those exceptions that you just
15   testified to?
16 A That I don't know.
17 Q Has the SVRS been changed in any way as a result
18   of receiving information back from county or
19   municipal clerks as a result of their looking at
20   these and considering these exceptions?
21 A Yes, it has.
22 Q When did the process begin of modifying or
23   changing the SVRS to correct for these exceptions?
24 A The SVRS version was released the first week of
25   December 2011.

28

1 Q Since the time that the SVRS was released in
2   December, has it been changed?
3 A Yes, it has.
4 Q Do you know, and is that an ongoing process, does
5   it continue to be changed as you get more
6   information back from county and municipal clerks?
7 A Yes, it is, it's an ongoing process.
8 Q Do you have any projection or estimate of when the
9   process of changing the SVRS, for the purpose of
10   the coming elections, will stop, or be complete?
11 A It will be complete prior to that election taking
12   place or prior to when they have to send absentee
13   ballots or print poll books.
14 Q Is there currently any kind of projected date by
15   which the GAB expects that to be done?
16 A For those having a February election, those will
17   need to be completed by February 1st. For those
18   having an April election, which is everybody,
19   those will have to be created -- completed by
20   middle of March.
21 Q The GAB has basically prioritized which ones it
22   needs to address first then based on when
23   elections are going to be held; is that correct or
24   fair to say?
25 A That is correct.

1 Q What happens if that process isn't completed by
2   the time that the elections are held?
3 A I guess I can't answer that. I can speculate,
4   but -- since it hasn't happened yet.
5 Q Are there any contingency plans that GAB has if
6   the process can't be completed by the time the
7   elections are held?
8 A Not that I'm aware of.
9 Q Is there something that you would recommend or
10   that you've thought about if the process can't be
11   completed by the time the elections are held?
12 A My expert recommendation on it would be that it
13   has to be completed, voters need to be districted
14   correctly prior to having the election.
15 Q So it just needs to get done beforehand?
16 A It does need to get done beforehand.
17 Q Do you know how much of the process of reconciling
18   these exceptions in the SVRS, how much of that
19   remains to be done?
20 A For those with February elections or April
21   elections?
22 Q Altogether.
23 A Altogether? It's probably about 50 to 60 percent
24   done at this point.
25 Q So if I went to -- strike that question. My

29

1   understanding is that any voter in Wisconsin is
2   entitled to obtain the SVRS if they want; is that
3   correct?
4 A They're entitled to request data from the SVRS.
5 Q Entitled to get the voter registration list,
6   correct?
7 A That is correct.
8 Q If I get the voter -- if I were to get the voter
9   registration list, would I also get the geocoded
10   data and the assignments to different districts?
11 A Not at this time. You would -- let me clarify
12   that.
13 Q Yeah. Please do.
14 A You would get assignments to what districts, but
15   you wouldn't necessarily get the latitude and
16   longitude coordinates of those addresses.
17 Q As the result of the changes that have been made
18   in the SVRS since it initially was released in
19   December, have the assignments of voters to
20   certain districts, has that assignment changed at
21   all?
22 A Has it changed from the initial implementation or
23   has it -- I guess, can you rephrase that maybe?
24 Q Sure. So the initial SVRS was released in you
25   mentioned, I think, the first week in December?

30

1 A Correct.
2 Q And the SVRS has been changed since that time as
3   municipal and county clerks have sent in corrected
4   data or corrected information; is that correct?
5 A Municipal and county clerks would correct geocode
6   locations within SVRS or boundary exceptions
7   within SVRS themselves, they don't necessarily
8   send that to the GAB to do. They make that
9   decision on their end. They make that correction.
10   Which is, like I said, is an ongoing process.
11 Q And let me stop you there. When they make that
12   correction, do they make that correction directly
13   in the SVRS?
14 A In regards to voters, yes, that is correct.
15 Q So they don't have to send that corrected data to
16   you or to the GAB to then put into the SVRS?
17 A The only corrected data that we receive from
18   county and municipal clerks or county and
19   municipal GIS would be corrected ward or school
20   district boundaries.
21 Q So if -- have there been situations then or
22   instances where municipal or county clerks have in
23   fact, since the first week of December, changed
24   information pertaining to voters who are located
25   within their municipalities or counties?

31

1 A Yes, they have.
2 Q And when that is done, is there, to the extent
3   that that change might cause a voter to be in a
4   different district than they were originally
5   assigned to, is that district assignment changed
6   as well in the SVRS?
7   MR. KELLY: Objection, form. You
8   may answer.
9 Q Do you understand my question?
10 A I do. That district assignment to that voter is
11   changed, but I would refer to it as corrected,
12   meaning that that voter is now placed into the
13   correct district that they should have belonged to
14   when SVRS was released with this in the beginning
15   of December.
16 Q Is there a way of determining how many voters in
17   the voter registration system have had corrected
18   districts since the list was released the first
19   week in December?
20 A Do you mean corrected districts in a sense that
21   the voter was placed into the correct district?
22 Q That's right. So in other words, I'm asking you a
23   comparative question. All voters were placed into
24   districts within the SVRS when it was released the
25   first week in December, correct?

32

Page 33

1 A That is correct.

2 Q Because of changes that have been input by some

3   municipal and county clerks since that time, there

4   are some voters whose districts have been

5   corrected; is that right?

6 A That is correct.

7 Q Is there a way of determining which voters those

8   are and which districts they were corrected for

9   them?

10 A There is tracking within the SVRS. We track a

11   number of different things as far as district

12   combo assignments.

13 Q Is that a, is that tracking something that could

14   be printed out or generated or exported to a

15   separate file so it could be -- you can generate a

16   list of what voters those are, at least what

17   districts they involve?

18 A You could do that. That would be one possible

19   way, I guess, of obtaining that, yes.

20 Q Are there other ways of obtaining that

21   information?

22 A Looking in the history within SVRS itself, there's

23   a history tab that's logged so that clerks can

24   look and see this person was assigned to this

25   district and they didn't belong there, they

Page 34

1   actually belong in this district, due to the

2   implementation of inaccurate geocodes or

3   inaccurate ward boundaries.

4 Q Has GAB gone and taken a look at how many voters

5   have had corrected districts noted in the SVRS?

6 A We have a general tally of quantities of where we

7   started with this process and where we are today.

8   The goal of what needs to be completed prior to

9   the election is to ensure that all voters are

10   districted correctly within SVRS, so we've kept

11   track of where we started with a number of

12   exceptions and how we've progressed.

13 Q Do you know where that stands today in terms of

14   the number of voters involved?

15 A I guess it would have to -- it would have to be

16   about what type of exception specifically. Like I

17   had stated earlier, we're about 50 to 60 percent

18   done with that.

19 Q All right. What about as far as municipal

20   boundary exceptions, do you know how many voters

21   are affected or have had their corrected -- their

22   districts corrected by this process?

23 A Percentage-wise, we're 85 percent done with -- or

24   complete with the municipal boundary exceptions.

25 Q Do you have any projection or estimate of when you

Page 35

1   might be completely done with the municipal

2   boundary exceptions?

3 A Prior to the elections.

4 Q Do you think before the February elections?

5 A For those having a February primary, yes, that

6   would be correct.

7 Q When you gave the 85 percent number, does that

8   refer both to people who will -- both to the

9   February and the April elections?

10 A That is correct.

11 Q Do you have, as you sit here today, I don't know

12   if you've -- if you have an idea of the numbers of

13   voters that we're talking about as opposed to the

14   percentage of completion, but do you have an idea

15   as to the number of voters who are -- have had a

16   change in their district -- well, strike that

17   question.

18   Do you have an idea, as you sit here today,

19   of the number of voters whose district has been

20   corrected in the SVRS?

21 A I don't have that off the top of my head, no.

22 Q Do you recall just any kind of an estimate, are we

23   talking about 10, 15, 20, 100, 1,000?

24 A When referring to those voters that had a

25   municipal boundary exception, I believe the number

Page 36

1   originally was about 60,000.

2 Q And is that through 85 percent of the process,

3   approximately?

4 A That is correct.

5 Q Is there a way to break down those 60,000 to

6   determine how many had a correction in their

7   district so that you can see whether it was an

8   assembly district, a senate district, or a

9   congressional district?

10 A Yes, there would be a way for us to determine

11   that. That hasn't been done though.

12 Q How could you determine that?

13 A We, you know, we could analyze where those voters

14   started, what wards were -- those voters were

15   assigned to, and then what wards made up those

16   senate, congressional, and assembly districts and

17   do a comparison of what changed since then.

18 Q So there is not -- I was wondering, going back to

19   this question about the historical records and the

20   SVRS, so there would be a way of doing that, so,

21   for example, let's say someone who is impacted by

22   one of these municipal exceptions and they

23   originally were recorded as being in one assembly

24   district, and when they're assigned to their

25   correct district, it turns out it's a different

Page 37

1 district. Is there a way of looking through the
2 history information on the SVRS and pulling those
3 people out and being able to tell what the
4 different districts were?
5 A There may be a way of doing that. Without, I
6 guess, analyzing that a little bit deeper, I guess
7 I couldn't give you a clear specific answer on
8 assembly, senate, and congressional districts.
9 Q As you sit here today, do you know how many voters
10 in the SVRS have had -- have had their assignment
11 changed in the SVRS or corrected in the SVRS so
12 that they had previously been assigned to one
13 congressional district and now they've been
14 assigned to a corrected congressional district?
15 A That I don't know.
16 MR. KELLY: And I'll object to the
17 form with that question. Belatedly.
18 Q But again, that is something that potentially
19 could be determined?
20 A Yes.
21 Q Same question for changes in assembly and senate
22 districts, that's something that could be
23 determined as well?
24 A I believe so, yes.
25 Q All right. Just so we can get ourselves grounded

Page 38

1 here, I'm going to -- I'd like to have you take a
2 look at a couple of documents that have previously
3 been marked as deposition exhibits at other
4 depositions. I'm going to hand you a copy of a
5 document that's been marked as Exhibit No. 79 at a
6 different deposition.
7 So, Mr. Meyer, I've given you a copy of
8 Exhibit 79, it's in front of you. Have you seen
9 this document before?
10 A I have.
11 Q Can you -- strike that. When did you first see
12 Exhibit No. 79?
13 A I first saw Exhibit 79 November 10, 2011.
14 Q So you didn't have any role in creating
15 Exhibit 79?
16 A My role in creating Exhibit 79 was to answer
17 technical questions as it related to it or
18 clarification of how to state technical things. I
19 did not draft Exhibit 79.
20 Q So you were asked to give input that was used to
21 create Exhibit 79?
22 A I was asked to give input to make clarifying
23 statements to ensure that technical correction or
24 use of technical terms was used correctly.
25 Q Who did you provide information to that was then

Page 39

1 used to create Exhibit 79?
2 A That would be Sarah Whitt and Shane Falk.
3 Q From a technical standpoint, what responsibility
4 does Sarah Whitt have with the redistricting
5 process?
6 A Sarah Whitt is, within the GAB, the SVRS
7 functional lead. Her role is a, more of a
8 business analyst, where she feeds those business
9 requirements to the technical side, which is what
10 I represent, so she's more or less my counterpart
11 on the, I guess, election administration or
12 business rules side of implementation of SVRS, and
13 she is the lead on that side with redistricting.
14 Q So she does not have sort of a technical function
15 in the same way that you do?
16 A She does to an extent, but she does not lead the
17 technical efforts within the implementation of
18 SVRS.
19 Q Now, I'd like you to -- I'm going to ask you some
20 questions about the particular document. I'll do
21 my best to describe to you the paragraph that I'd
22 like you to look at and the sentence and ask you
23 some questions about those.
24 On the first page of Exhibit 79, on the very
25 first paragraph, you will see a statement in the

Page 40

1 second sentence that says, "New issues have been
2 brought to our attention that directly impact the
3 Government Accountability Board's (GAB)
4 redistricting initiative." Do you see that?
5 A Which paragraph are you referring to?
6 Q It's the very first paragraph, right under the
7 subject line.
8 A I do see that.
9 Q And then the next sentence it says, "Several
10 practical implementation concerns have arisen
11 regarding census blocks conflicting with actual
12 municipal boundaries." Do you see that?
13 A Yes, I do.
14 Q Does that refer to the municipal boundary
15 exceptions that you were just testifying about?
16 A That would be one reason for a municipal boundary
17 exception to occur, correct.
18 Q So the conflict between census blocks and
19 municipal boundaries that are discussed in
20 Exhibit 79 is a subset or an example of the kinds
21 of municipal boundary exceptions you testified
22 about before?
23 A It would be a subset of where that municipal
24 boundary is drawn compared to where that voter
25 actually resides or their latitude and longitude

1   places them.
2 Q That's what's being discussed in this particular
3   memo; is that correct?
4 A That's part of it.
5 Q All right. Well, let's take a look at the memo
6   then. There is a reference, and I'm going to jump
7   down here to the bottom of that first page, it's
8   the paragraph that starts out In Wisconsin, the
9   Census TIGER map files; do you see that?
10 A Yes, I do.
11 Q What is a TIGER map file?
12 A TIGER map file is a shapefile generated by the
13   census. Census keeps track of -- or generates
14   numerous different types of shapefiles within
15   their GIS-based system.
16 Q And when you say shapefile, what are you referring
17   to there?
18 A The shapefile would be the, I guess, technical or
19   graphical representation of a boundary of some
20   sort.
21 Q So the TIGER file then is generated from census
22   data; is that correct?
23 A That is correct.
24 Q And the census data that we're talking about and
25   the TIGER files that we're talking about in

41

1   to create new districts." Do you see that?
2 A Yes, I do.
3 Q I'd like to focus there on the reference to the
4   term *state legislature*. Do you know whether
5   WISE-LR was actually used by the state legislature
6   in 2011 to create the district boundaries in
7   Acts 43 and 44?
8 A That I don't know.
9 Q You did testify earlier, though, that the
10   boundaries that you received for Acts 43 and 44
11   from the LTSB were generated from the census data,
12   correct?
13 A To my knowledge, that is correct.
14 Q So that would have been from TIGER files?
15 A The base files of that, yeah, would have been from
16   TIGER files.
17 Q I'd like you to turn to the second page, and the
18   second full paragraph. And do you see there is a
19   reference in the first sentence to the TIGER data
20   from 2010 census; do you see that?
21 A Yes, I do.
22 Q And it says it's more accurate in terms of
23   geography than it was in 2000, correct?
24 A That is correct.
25 Q The memo then goes on to say, "However, it still

43

1   Exhibit 79 are ones that were generated as a
2   result of the 2010 census, correct?
3 A To my knowledge, that is correct.
4 Q I think there are some passing references to 2000
5   census data, but what you're dealing with for
6   redistricting is the 2010 census data, correct?
7 A That would be correct.
8 Q Now, it says in that paragraph, same paragraph,
9   reading on, it says that the census TIGER map
10   files and demographic information are loaded into
11   a tool called WISE-LR, which is administered by
12   the Legislative Technology Services Bureau; do you
13   see that?
14 A Yes, I do.
15 Q What is WISE-LR?
16 A To my knowledge, WISE-LR is the tool that the
17   Legislative Technology Services Bureau, or LTSB,
18   uses for -- or administers to clerks for
19   generating their ward boundaries.
20 Q So it is something that's used on the municipal
21   and county level to generate the ward boundaries?
22 A That is correct.
23 Q There is, the next sentence goes on, it states,
24   "WISE-LR is then used by Wisconsin counties and
25   municipalities, as well as the state legislature,

42

1   contains substantial inaccuracies with
2   administrative boundaries, specifically municipal
3   boundaries and school district boundaries." Do
4   you see that?
5 A Yes, I do.
6 Q So it's the municipal boundaries that I want to
7   focus on here and ask you about. The
8   inaccuracies -- well, let me ask you just to
9   describe in your own words what are the
10   substantial inaccuracies with the municipal
11   boundaries from the TIGER data?
12   MR. KELLY: Objection, form. You
13   may answer if you can.
14 A Specifically, I don't know specifics. You'd have
15   to look at every municipality in its own to see
16   where those differences may occur.
17 Q So those inaccuracies would be specific to each
18   different municipality; is that correct?
19 A That would be correct.
20 Q Generally speaking, what is the -- or can you
21   generally describe what the nature of the
22   inaccuracies in the TIGER data are with respect to
23   municipal boundaries?
24 A Generally speaking, it would be that where TIGER
25   data had drawn the municipal boundaries was

44

1 different from where the local municipalities or
2 the local GIS had drawn the municipal boundaries.
3 Q And the local data is deemed to be more accurate
4   by GAB; isn't that correct?
5   MR. KELLY: Objection, form.
6 A It's deemed to be more accurate by the locals, by
7   the clerks, county, municipal. We allow them to
8   make that decision, whether it's more accurate or
9   not.
10 Q Now, the memo, again, reading in the same
11   paragraph, the memo, next sentence goes on to
12   read, "According to the 2010 Census TIGER/Line
13   Shapefiles Technical Documentation, the positional
14   accuracy of the TIGER 2010 data meets a standard
15   of approximately plus or minus 50 meters," which
16   is then in parens, "plus or minus 167 feet. This
17   appears to have been achieved in some cases, but
18   there are other cases where the data is off by
19   more than 50 meters." Then continues on, "Even if
20   lines are within 50 meters, that margin of error
21   allows for multiple houses to be placed in the
22   wrong district all along the boundary line." Do
23   you see that?
24 A Yes, I do.
25 Q And is that the, one of the municipal exceptions

45

1 that you were talking about before or testified
2 about before?
3 A Yes, it would be.
4 Q Keeping in mind that this is, the memo is dated as
5   of November 10th, if we look in the next section,
6   which is captioned Correcting Municipal Boundaries
7   and Wards, and we look in that second paragraph,
8   it states, "Based on initial analysis, Rock County
9   identified approximately 200 addresses that were
10   placed in the wrong municipality based on the
11   TIGER 2010 data." Do you see that?
12 A Yes, I do.
13 Q Now, how did that come to the attention of the
14   GAB?
15 A From my understanding, the Rock County clerk,
16   county clerk, in conjunction with their local GIS,
17   did an analysis and contacted Sarah Whitt with
18   questions around the accuracy of that in
19   comparison to what their local municipal
20   boundaries were.
21 Q All right. Do we know -- or is it -- well, strike
22   that. Sitting here, do you know, of those 200
23   addresses that were placed in the wrong
24   municipality based on the TIGER data, do you know
25   how many of those addresses, if any, might have

46

1 been placed into an incorrect legislative
2 district, be it an assembly district, senate
3 district, or congressional district?
4   MR. KELLY: Objection, form. You
5   may answer if you can.
6 A That I don't know.
7 Q Do you know, of those 200 addresses, how many of
8   them may have been corrected in the SVRS such that
9   they have had their legislative district
10   corrected?
11 A That I don't know.
12 Q Is there a way of determining that from the SVRS
13   database?
14 A Specifically, no, because I don't know what
15   specifically those 200 addresses are.
16 Q If we were to go through a process, that you had
17   testified before could be done, would we be able
18   to look at Rock County addresses and make a
19   determination of how many addresses there are
20   within Rock County that would have had their
21   legislative districts corrected?
22 A Yes, you could do that type of analysis.
23 Q There is, paragraph goes on -- we won't read it
24   all -- the paragraph goes on to talk about houses
25   that are in the city of Janesville but that were

47

1 incorrectly placed in the town of Harmony; do you
2 see that?
3 A Yes, I do.
4 Q And then the last few sentences of that paragraph
5   states, "Obviously, this situation also creates
6   the likelihood of a shift in the population for
7   the city of Janesville and town of Harmony under
8   Act 43, which specifically attributed certain
9   census blocks to incorrect municipalities." And
10   it goes on to say, "This situation is repeated in
11   many other counties, if not all counties." Do you
12   see that?
13 A Yes, I do.
14 Q Do you know the magnitude of the shift in
15   population for the city of Janesville and town of
16   Harmony under Act 43?
17   MR. KELLY: Objection, form. You
18   may answer if you believe you can.
19 A I don't know.
20 Q Is there a way of determining that from the SVRS
21   database?
22 A Not that I'm aware of. SVRS only tracks voter
23   registration, it doesn't track population.
24 Q Is there a way of determining statewide, whether
25   from the SVRS or any other database or

48

1   information, the implications for the movement of
2   population or shift in population under Act 43?
3   MR. KELLY: Objection, form.
4 A Not that I'm aware of.
5 Q There is that reference at the end of that
6   paragraph that states, "The situation is repeated
7   in many counties, if not all counties." Do you
8   see that?
9 A Yes, I do.
10 Q Again, this is as of November 10th. Has the GAB
11   had an opportunity to look, since November 10th,
12   and see how many counties are affected by this
13   problem?
14 A We were able to conduct an analysis of 16
15   counties, since the time of this memo.
16 Q And that analysis is reflected in a more recent
17   memo, correct?
18 A That is correct.
19 Q That's what I'll refer to as a January 13, 2012
20   memo; is that right?
21 A That's correct.
22 Q How did the GAB determine that it would look at
23   those 16 counties?
24 A The 16 counties that were identified were those 16
25   counties that we received local or county-based

49

1   wards from their local or county-based GIS. The
2   only way to compare the data is if you have the
3   data, so the ones that we received at the time of
4   that analysis, we had 16 that we could use for
5   comparison purposes.
6 Q And we'll go through that January 13th memo in
7   just a minute, and I'll have a few questions for
8   you based on that. Since the time that that
9   January 13th memo came out, have you received any
10   data from any additional counties?
11 A Yes, we have.
12 Q How many additional counties have sent you data?
13 A Approximately, I believe we have now 24 counties
14   where we have received ward and school
15   district-based shapefiles from their county or
16   local-based GIS.
17 Q Do you expect to get shapefiles in from all
18   counties in Wisconsin by the time the process is
19   done?
20 A I don't expect us to get it from all counties.
21   Not all counties have a GIS-based system. They
22   rely on other providers for GIS base data.
23 Q Do you know approximately how many counties or do
24   you have an expectation of how many additional
25   counties will submit data to you?

50

1 A That I don't know.
2 Q Have you given the counties -- strike that. Has
3   the GAB given the counties a deadline of when they
4   need to transmit any information back to the GAB?
5 A For those, what I'm aware of, is for those that
6   have a February primary, we requested that any
7   ward-based shapefile updates be sent to us as of
8   January 23rd.
9 Q So that would have been last Friday?
10 A Monday. Right?
11 Q Yes, you're right. Monday. Wrong week. And for
12   the areas that are having elections in April, when
13   have you requested they get you any updates?
14 A I'm not aware of a date that has been set for
15   those at this time.
16 Q I'd like you to turn to the next page then, page 3
17   of Exhibit 79. All right. Now, I'd like to draw
18   your attention to the first paragraph, first full
19   paragraph on page 3. Do you see the first
20   sentence that identifies Acts 43 and 44 as having
21   the districts in those maps being built using
22   census blocks?
23 A I do see that.
24 Q And is that a process that you're familiar with?
25 A It is not.

51

1 Q The next sentence goes on and states, "The
2   texts" -- "the text of these acts, now in statute,
3   specifies the district boundaries according to
4   individual census blocks." Do you see that?
5 A Yes, I do.
6 Q And is that consistent with your understanding of
7   how the district boundaries are maintained by the
8   GAB?
9 A Can you rephrase that?
10 Q Sure. Is it your understanding, going back to
11   your testimony about the district boundaries,
12   assembly, senate, and congressional district
13   boundaries that were transmitted to the GAB by the
14   LTSB, that those are in fact based on census
15   blocks?
16 A That is correct.
17 Q Now, the memo goes on to say, "For the city of
18   Janesville/town of Harmony example, the statute
19   clearly states that the given assembly district
20   includes the town of Harmony census blocks 3004
21   and 3059," correct?
22 A Yes.
23 Q And is that your understanding of the situation as
24   it was?
25 A Specifically, I don't recall the specifics census

52

1   blocks, but I'm assuming this is correct.
2 Q Were you asked to look at all at that particular
3   analysis that was done for the city of Janesville,
4   town of Harmony example?
5 A I was involved in the process with that.
6   Specifically, I didn't conduct the analysis myself
7   though.
8 Q Going on, the next sentence says, "This is
9   problematic for enforcement purposes because those
10   census blocks do not reflect the correct municipal
11   boundaries and the results of implementing these
12   incorrect boundaries in SVRS would place voters on
13   the wrong poll books for each election," correct?
14 A That is correct.
15 Q And then it states, "After local clerks make these
16   corrections, the districts in SVRS would not match
17   Acts 43 and 44 precisely," correct?
18 A That is what it says.
19 Q So now the clerks have gone through and they've
20   corrected in the SVRS the districts that some of
21   those voters are in, correct?
22   MR. KELLY: Objection, form. If
23   you believe you can answer, you may.
24 A Specifically to the city of Janesville, town of
25   Harmony?

53

1 Q Generally, with Acts 43 and 44 in the SVRS.
2 A Generally, they have corrected those.
3 Q And so the districts as corrected in the SVRS
4   would then be different than the districts that
5   were assigned by Acts 43 and 44, correct?
6   MR. KELLY: Objection, form.
7 A Not specifically, no. We still use the shapefile
8   boundaries that are defined in Acts 43 and 44. We
9   don't modify the senate, assembly, and
10   congressional district boundaries. What the
11   locals identifies ward-based boundaries that make
12   up those senate, assembly, and congressional
13   districts.
14 Q But in SVRS as it's corrected, to the extent that
15   voters have had their assembly, senate, or
16   congressional districts corrected, those would be
17   different than the way that they're treated under
18   Acts 43 and 44, correct?
19   MR. KELLY: Objection, form.
20 A Can you rephrase that?
21 Q Sure. If those voters under Act -- if a voter
22   under Act 43 or 44 were placed in an incorrect
23   district, all right, and subsequent to that time
24   the district to which they're assigned has been
25   corrected, as part of the process we've been

54

1   discussing here, that district, the corrected
2   district is going to be different than the
3   district they were placed in by Act 43 and 44; is
4   that correct?
5   MR. KELLY: Objection, form.
6 A That could be a possibility.
7 Q Is the GAB talking at this point or have they
8   talked at all about altering or correcting the
9   boundaries created by Acts 43 and 44 to conform to
10   the corrected districts under the SVRS?
11   MR. KELLY: Objection, form.
12 A Specifically, no, we haven't talked about
13   adjusting the senate, assembly, and congressional
14   district boundaries.
15 Q The next paragraphs down is entitled, or there's a
16   caption that says GAB Redistricting Initiative in
17   SVRS; do you see that?
18 A Yes, I do.
19 Q So there is a reference, in the second full
20   paragraph, and I'm looking at the third sentence,
21   it says, "Clerks will be given exception reports
22   that will identify voters who may have been put in
23   the wrong district, and they will be asked to
24   correct them." Do you see that?
25 A Yes, I do.

55

1 Q Have you created and sent to clerks exception
2   reports?
3 A Yes, and those are what I referred to earlier as
4   the exceptions that the clerks were working
5   through.
6 Q Got it. And have the clerks, do they fill out
7   those exception reports and send them back, or are
8   these just things that they look at and then use
9   those as a basis to determine whether they need to
10   go in and change specific voter information on the
11   SVRS?
12 A They don't send them back to us. They correct
13   those or make that decision and then make those
14   corrections within the SVRS.
15 Q Does the GAB still have copies of those exception
16   reports that were created and sent out?
17 A The reports themselves are actually live reports,
18   and they change on a daily basis. So it's, as
19   they correct the exceptions, those exceptions come
20   off the report because they're no longer an
21   exception, and they use that as a tool for them to
22   help correct any potential voters that have been
23   placed into the wrong districts.
24 Q So that's a living document that's being updated
25   every day basically?

56

Page 57

1 A That is correct. The only report that was sent to
2   municipalities that was static was when we did the
3   address conversion, using the USPS standards, some
4   addresses formats changed, and we sent those
5   reports for them to evaluate to make sure that
6   they didn't change the address in an adverse way.
7   Those were sent to them in Excel format.
8 Q Is there some way that the GAB has of tracking the
9   exception reports that have been created and when
10   things are corrected by the clerks?
11 A In some cases, yes, that would be true. In other
12   types of exceptions, I guess it would be
13   specifically on what type of exception you would
14   be talking about.
15 Q What about for the municipal boundary exceptions?
16 A Specifically with those, yes, we would know which
17   ones were originally assigned or had a municipal
18   boundary exception and thus those that have been
19   changed or corrected since then.
20 Q Now, the next paragraph down refers to Phase 1 of
21   the SVRS updates, and you state that they will be
22   available to clerks on December 1st. Was that the
23   initial SVRS that was rolled out the first week in
24   December that you were talking about?
25 A It was. The actual date turned out to be

Page 58

1   December 5th, I believe. It was a Monday.
2 Q And so that didn't include any of this corrected
3   information that we're talking about; is that
4   correct?
5 A That is correct. Clerks hadn't begun correcting
6   anything until after that date.
7 Q Second to last sentence of that paragraph states,
8   "If a boundary line is in the wrong place in SVRS,
9   GAB technical staff will need to correct it." Do
10   you see that?
11 A Yes, I do.
12 Q Is that something that's been done?
13 A No, it has not. Specifically what this is
14   referring to is district combo boundaries, which
15   would be a combination of a ward and a school
16   district. For any changes to those boundary
17   lines, we have relied on local and county-based
18   GIS to make those corrections.
19 Q So that's, the change there from this memo is that
20   GAB technical staff is not doing it, that's being
21   left to the local municipalities and counties?
22 A That is correct at this time.
23 Q Is there an expectation or an anticipation that
24   GAB might get involved in that process?
25 A Yes, actually as the next sentence kind of states.

Page 59

1   As part of Phase 2 of redistricting, we're
2   developing tools for clerks to be able to adjust
3   boundaries, whether they be a ward boundary or
4   school district boundary or sanitary district
5   boundary, after the spring elections.
6 Q When you say after the spring elections, do you
7   mean after the elections in April?
8 A That is correct.
9 Q Turning to page 4, there is a heading Use of
10   Corrected Wards in SVRS. There's a reference to,
11   "Approximately 21 counties thus far have asked
12   that we use their corrected wards and/or municipal
13   boundaries in SVRS, rather than the census-based
14   lines we are getting from the legislature, to
15   ensure that the lines are placed accurately and
16   thus voters show up on the correct poll lists."
17   Do you see that?
18 A Yes, I do.
19 Q So as of November 10th, there were 21 counties
20   that had made that request; is that right?
21 A There were 21 counties that had made that,
22   correct.
23 Q And as of today, how many counties have made that
24   request?
25 A Approximately 24 counties.

Page 60

1 Q Is there a list of those counties that the GAB
2   has?
3 A Yes, there is.
4 Q There's a reference, the next sentence down, that
5   states, "Because wards are the building blocks for
6   all the other representational districts, if we
7   use the corrected wards, this also corrects the
8   municipal boundaries, county supervisor,
9   aldermanic, state senate, state assembly, and
10   congressional districts." Do you see that?
11 A Yes, I do.
12 Q And is that simply the process you were describing
13   before where a municipal or a county clerk would
14   make a change to the SVRS and it would make an
15   associated change to a district?
16 A No, that's not correct.
17 Q Okay. Can you describe this for me?
18 A Yes. So what this is referring to is from the 21
19   or 24 counties that we received ward-based
20   shapefiles from their county GIS, wards make up,
21   as it states, wards make up all of -- it's the
22   building block for all other districts within
23   SVRS. So a ward belongs to a specific state
24   senate, assembly, and congressional district. A
25   ward belongs to a county sup district, an

1 aldermanic district. This is referring to those
2 corrected shapefiles that we received from the
3 county GIS.
4 Q What did you do with the corrected shapefiles when
5 you received them?
6 A We, as the technical team, did an analysis on them
7 to make sure that those files are projected in the
8 correct format, which would be WGS84. If not, we
9 would provide that feedback back to the county GIS
10 and have them make those corrections so that we
11 can have a projection that matches all of the
12 other districts that are projected or used within
13 SVRS. After we receive that, we, like we did with
14 the LTSB-based ward files, upload those into SVRS
15 and then regenerate district combo assignments for
16 those voters.
17 Q So the assignments of the district combos in the
18 SVRS reflects the corrected wards and the
19 information that you are receiving, by you, I mean
20 GAB is receiving from the municipal and the county
21 clerks?
22 A That would be correct.
23 Q There's a plan of action that's referred to then
24 in the next section; do you see that?
25 A Yes, I do.

61

1 Q The memo states, "It is critical to have the most
2 accurate boundary lines possible in SVRS, in order
3 to assure voters of their correct districts, avoid
4 voter and election confusion, and to have a
5 manageable work flow for clerks. To reach that
6 goal, the technical team will use the corrected
7 districts wherever it is possible to do so." Do
8 you see that?
9 A Yes, I do.
10 Q Now, who is the technical team?
11 A That would be the team that reports for -- through
12 me.
13 Q This is the team then that you are in charge of?
14 A Correct.
15 Q It then refers to using the corrected districts
16 wherever it is possible to do so. What is the use
17 that's referenced there?
18 A The use would be, as I stated just previously, the
19 use of those are the upload of those corrected
20 ward or school district-based shapefiles from the
21 county GIS and district combo assignments based
22 upon those ward-based boundaries.
23 Q For the SVRS?
24 A For the SVRS.
25 Q But those are not being used in any way with

62

1 respect to Acts 43 and 44, correct?
2 A Can you rephrase that?
3 Q In other words, those are not being used in any
4 way to change or alter the assembly or senate or
5 congressional boundaries prescribed by Acts 43 and
6 44, correct?
7 A That is correct, yeah, we don't use county GIS
8 data to change those boundaries. What changes is
9 the ward-based -- the ward shapefiles that those
10 voters are assigned to.
11 Q I'd like to hand you now a document that's been
12 marked as Exhibit No. 80, and this is the
13 January 13th memo that we were just talking about.
14   MS. LAZAR: Do you want to take a
15   few minutes? Do you need to break?
16   THE WITNESS: No, I'm good.
17 Q Before I get into Exhibit 80, I wanted to ask you,
18 have you been through this redistricting process
19 before?
20 A I have not.
21 Q This is your first time doing it?
22 A Yes, it is.
23 Q What kind of training did you receive before -- in
24 redistricting before going through this process,
25 if any?

63

1 A Specifically in regards to redistricting?
2 Q Yes.
3 A I don't have any specific background, training in
4 redistricting. My background is technology, IT,
5 project management, not specifically towards
6 redistricting.
7 Q So has there been a time before this year that you
8 ever used the SVRS?
9 A No, there is not.
10 Q Or the WISE-LR system?
11 A I've never used the WISE-LR system.
12 Q Have you ever used software called autoBound
13 before?
14 A I have not.
15 Q Is that software that you're familiar with?
16 A It is not.
17 Q Looking at Exhibit 80 then, is this a document
18 that you've seen before?
19 A I have seen this, yes.
20 Q And this is the January 13th memo that we were
21 referring to before?
22 A Correct.
23 Q There is a reference in the subject line, it says
24 Redistricting Anomalies - Municipal or Ward
25 Boundaries; do you see that?

64

1 A Yes, I do.

2 Q And just generally speaking, what is your

3   understanding of the anomalies that are referred

4   to in Exhibit 80?

5 A Specifically what they're referring to there, that

6   I don't know. I mean, I can imply, I guess, but I

7   don't know specifically what they're speaking of

8   anomalies.

9 Q Have you, within the GAB itself, have you spoken

10   of any anomalies with respect to redistricting?

11 A One of the things that we conducted was an

12   analysis of 16 counties that identified anomalies,

13   potential anomalies within the difference between

14   the ward-based shapefiles that we received from

15   LTSB and those ward-based shapefiles that we

16   received from county and local GIS.

17 Q And that's what's referred to in the January 13th

18   memo, correct?

19 A I believe so, yeah. Yes.

20 Q All right.

21 A On page 4 specifically.

22 Q Looking on page 2, down toward the bottom, you'll

23   see a caption that says Redistricting Anomalies;

24   do you see that?

25 A Yes, I do.

65

1 Q I'd like to actually draw your attention to the

2   paragraph just before.

3 A Okay.

4 Q And the first sentence of that paragraph states,

5   "Approximately 20 counties have now taken

6   advantage of the GAB's direction and coordinated

7   the loading of their more accurate municipal and

8   boundaries from their county GIS systems into

9   SVRS." Do you see that?

10 A Yes, I do.

11 Q So that's 20 of the 24 counties that you've

12   received data from?

13 A Yeah, at the time, like I said, it's an ongoing

14   process that we're assessing and making sure that

15   the county GIS data we can use, which is why I

16   previously, in the November 10th memo, it had a

17   different number. You know, as counties request

18   us to use their local GIS data, we have to take --

19   we have to ensure that that data is going to work

20   within the SVRS system. So when I stated 24

21   counties, that's how many right now that we're

22   working with to implement into the SVRS.

23 Q So this is just a snapshot in time, in other

24   words?

25 A It's just a snapshot in time.

66

1 Q I'm just looking through this because I note that

2   quite a bit of the information in this is a rehash

3   or same information that's contained in the

4   earlier memo.

5   If you look at page 3, there is a heading

6   that states Accuracy of TIGER and WISE-LR Maps; do

7   you see that?

8 A Yes, I do.

9 Q And in the first full paragraph, the last couple

10   of -- the last two sentences, the second to the

11   last sentence talks about exceptions such as

12   voters who appeared on the legislative maps to be

13   in one district but actually live in a different

14   district. And the next sentence states, "This

15   also became apparent during the 2011 recall

16   elections where addresses that were challenged

17   using the legislative maps were then overturned by

18   GAB based on the more accurate information in

19   Statewide Voter Registration System." Do you see

20   that?

21 A Yes, I do.

22 Q Was that a process that you were involved with at

23   all?

24 A No, it is.

25 Q And it's because the recall elections happened

67

1   before you started with the GAB?

2 A That is correct.

3 Q Since the time that you started with the GAB, have

4   you been asked to go back and take a look at any

5   of those challenges or how that issue came up in

6   the context of the recall elections?

7 A No, I have not.

8 Q Do you know whether the GAB maintained any kind of

9   list or log or report of exceptions that were

10   identified as part of the recall elections?

11 A That I don't know.

12 Q If you jump down to the end of the -- toward the

13   end of the page, there is -- the last two

14   sentences of that paragraph state, "For most of

15   the state, SVRS contains the GIS shapefiles of the

16   district and ward maps exclusively from the

17   WISE-LR maps." Do you see that reference there?

18 A Yes, I do.

19 Q And then it goes on to state, "For about one-third

20   of the state, SVRS contains GIS shapefiles from

21   county or municipal GIS personnel, which are more

22   precise than the WISE-LR maps and can also be

23   loaded into SVRS." Do you see that?

24 A Yes, I do.

25 Q And as I understand that statement in the context

68

1 of your previous testimony, and please correct me
2 if I'm wrong, it's about one-third of the counties
3 in the state that you expect will give you more
4 accurate county or municipal GIS data?
5 A Correct, approximately one-third.
6 Q And would that be about where the number 24 comes
7   from that you were using?
8 A That's correct.
9 Q Because there are 72 counties in Wisconsin?
10 A That's correct.
11 Q I just want to make sure I understand and we're on
12   the same page here.
13   If you turn to page 4, there is a heading
14   Reports and Analyses of Municipal and Ward
15   Boundaries Anomalies; do you see that?
16 A Yes, I do.
17 Q And what does the use of the word *anomalies* mean
18   there? Strike that question. What does the use
19   of the word *anomalies* refer to there?
20   MR. KELLY: Objection, form.
21 Q Generally.
22 A Generally speaking, as part of the analysis that
23   this refers to, this is actually the analysis that
24   I conducted, anomalies would refer to those voters
25   that were placed into an incorrect ward in

69

1   comparison of the county-based GIS data to the
2   LTSB-based GIS data.
3 Q So this, and by this I mean the section here, the
4   Reports and Analyses of Municipal and Ward
5   Boundaries Anomalies, that appears on page 4 of
6   Exhibit 80, this is an analysis that you
7   performed?
8 A That is correct.
9 Q So let's take a look at this then. The second
10   full paragraph, it states, "Based on initial
11   analysis, Rock County (which at the time relied
12   exclusively on GIS shapefiles of the district and
13   ward maps from WISE-LR) reported identifying
14   approximately 200 addresses that were placed in
15   the wrong municipality based on the TIGER 2010
16   data." Do you see that?
17 A Yes, I do.
18 Q And that's the same statement I think that we had
19   seen in the November 10th memo, correct?
20 A Correct.
21 Q Was there additional analysis that you had done
22   for Rock County as of the time of the January 13th
23   memo that you hadn't previously done?
24 A Specifically to these 200 addresses, no.
25   Rock County was included in our analysis of the

70

1   ward comparisons. What we actually learned from
2   that comparison is that Rock County GIS had not
3   yet corrected those ward-based boundaries.
4 Q Have they done so since that time?
5 A They have provided us updated ward boundaries for
6   most municipalities in Rock County.
7 Q So these 200 addresses that are referred to here,
8   if you knew what those addresses were, you could
9   go into the SVRS and they should be updated or
10   corrected at this time then?
11 A If I knew what those 200 addresses were, we could
12   do an assessment to see if they had been
13   corrected.
14 Q Your understanding, though, is they should have
15   been corrected by this time because this process
16   has been performed for Rock County?
17 A That would be correct.
18 Q The next sentence, this is the second sentence of
19   that second full paragraph, states, "Rock County
20   provided a specific example of some corrections to
21   municipal boundaries that directly conflict with
22   census blocks and the specific statutory language
23   of Acts 43 and 44, affecting state assembly, state
24   senate, and congressional districts." Do you see
25   that?

71

1 A Yes, I do.
2 Q Do you know what the specific statutory language
3   of Acts 43 and 44 are that are referred to here?
4 A No, I do not.
5 Q Do you know who prepared this particular summary
6   of the analyses that you performed?
7 A That I do not know. I -- somebody at GAB.
8 Q And there is -- here there's a reference to the
9   town of Harmony and the city of Janesville,
10   correct?
11 A That is correct.
12 Q Now, there was a graphic representation of the
13   anomaly that was prepared; isn't that correct?
14 A Yes, there was. That was prepared by the local
15   GIS.
16 Q I'm going to hand you a copy of a document that we
17   will mark as 87.
18   (Exhibit No. 87 marked for
19   identification)
20 Q Mr. Meyer, I've handed you a document that the
21   court reporter has marked as Exhibit No. 87. Do
22   you have that in front of you?
23 A Yes, I do.
24 Q Is Exhibit 87 a graphic representation of the
25   discrepancy or anomaly that's described in the

72

1 analysis on page 4 with respect to the town of
2 Harmony and the city of Janesville?
3 A Yes, it is.
4 Q And who prepared Exhibit 87?
5 A We received Exhibit 87 from the county clerk and
6   the county GIS.
7 Q Is it your understanding then that Exhibit 87 was
8   prepared by someone associated with Rock County?
9 A That is correct.
10 Q Now, there's a reference in the analysis paragraph
11   of Exhibit No. 80 that states, "In this case, the
12   municipal boundary between the town of Harmony and
13   the city of Janesville was approximately 0.1 mile
14   off (528 feet) in the census data. This caused
15   census blocks containing nine houses that are in
16   the city of Janesville to be incorrectly placed in
17   the town of Harmony." Do you see that statement?
18 A Yes, I do.
19 Q So now, if we look at Exhibit 87, can you identify
20   for me the nine houses that were -- that are in
21   the city of Janesville and that were incorrectly
22   placed in the town of Harmony?
23 A Specifically the nine houses, it refers to the
24   boundary in this area.
25 Q And because we'll need to describe that for the

73

1 record here because the court reporter --
2 A I'm sorry.
3 Q That's okay. She just can't take down gestures or
4   where you're pointing. It gets a little stilted
5   sometimes, but we'll do our best. Are those
6   located within certain census blocks that are
7   depicted on Exhibit 87?
8 A They're depicted, yeah, in census blocks 3095 and
9   3004.
10 Q So the census data, the TIGER 2010 data, placed
11   those nine houses that are at issue within the
12   town of Harmony, correct?
13 A That is correct.
14 Q So under Acts 43 and 44, those nine houses are
15   treated as being in the town of Harmony, correct?
16   MR. KELLY: Objection, form.
17 A Specifically Acts 43 and 44, that I don't know.
18 Q In fact, according to the Rock County clerk's
19   data, those houses are actually in the city of
20   Janesville, correct?
21 A According to the Rock County clerk, that is
22   correct.
23 Q Do you know whether those houses -- strike that
24   question. Do you know whether the Rock County
25   clerk has now updated the SVRS so that those

74

1 houses, those addresses and the voters who live in
2 them have had their -- have had a correction made
3 to the assembly, senate, and congressional
4 districts in which they live?
5   MR. KELLY: Objection, form.
6 A Specifically to those nine houses, I'm not aware
7   if they've made those corrections.
8 Q Do you know if the Rock County clerk has made any
9   corrections to the SVRS database with respect to
10   correcting addresses of voters in Rock County?
11 A Specifically at this time, no, I don't know if
12   they have gone through and evaluated their
13   exceptions and corrected things.
14 Q I note -- I'm not going to mark them here as
15   exhibits, unless we need to, and I could do it. I
16   note that there were some additional graphic
17   representations that were made for an area of
18   La Crosse. Have you seen those before?
19 A Yes, I have.
20   MR. KELLY: Objection, form.
21   MR. POLAND: All right. I mean, if
22   you want, I can mark them and put them in
23   front of him if you would prefer.
24   MR. KELLY: I mean, if you're going
25   to ask him any questions about them, I think

75

1 that's probably the best way to go, because
2 otherwise, I mean, you're asking him about a
3 graphical representation about something he's
4 not seeing.
5   MR. POLAND: That's fair, Dan. I
6   was just going to ask if any others have been
7   created. I'll just ask that question.
8 Q In addition to any graphical representations of
9   these discrepancies, anything in addition to the
10   town of Harmony and city of Janesville one that we
11   looked at in Exhibit 87 and graphical
12   representations of the La Crosse area, do you know
13   of any other graphical representations of
14   discrepancies between municipal boundaries and
15   ward boundaries that have been created?
16 A Yes, I'm aware of other, I guess, pictures similar
17   to the Rock County example that depict some
18   examples of those anomalies.
19 Q And what specific geographic areas have visual
20   images or pictures been created for?
21 A We've -- I've created examples in the city of
22   La Crosse, or La Crosse County, Dane County, and
23   Monroe County.
24 Q Would it be possible for each area where there is
25   a discrepancy to be able to create the same kind

76

1   of graphical representations that you've created
2   for La Crosse and Dane County and Monroe County?
3 A Can you repeat that?
4   MR. POLAND: Can you read the
5   question back.
6   (Question read)
7 A Yes, that would be technically possible.
8 Q In that same paragraph, again, this is the second
9   paragraph on page 4 of Exhibit 80, there's the
10   statement, this is the last, the second to last
11   sentence, "Obviously, this situation also creates
12   the likelihood of a shift in the population for
13   the city of Janesville and town of Harmony under
14   Acts 43 and 44, which specifically attributed
15   certain census blocks to incorrect
16   municipalities." Do you see that sentence?
17 A Yes, I do.
18 Q What is meant there by shift in the population, if
19   you know?
20 A That I don't know.
21 Q Now, the next paragraph down, there's a reference
22   to LTSB conducting a limited analysis of 19
23   counties, comparing the circumference of municipal
24   boundaries from the WISE-LR maps to circumference
25   of municipal boundaries in county shapefile maps,

77

1 A We did have a meeting with them to review their
2   analysis at a high level, specifically to the
3   4,204 voters. For those that changed assembly
4   districts, we did not get into those type of
5   details.
6 Q When did you meet with LTSB to discuss that
7   analysis?
8 A It was in December, I believe.
9 Q Was it before the SVRS was released that first
10   week in December or was it after that time?
11 A It was after that time.
12 Q Were you able to verify that limited analysis that
13   LTSB conducted?
14 A Can you restate that?
15 Q Sure. Were you able to determine whether that
16   limited analysis that LTSB conducted was in fact
17   correct?
18 A From the data that we were given from LTSB, we
19   weren't able to conduct whether it was correct or
20   not. We didn't have enough data to make that type
21   of a decision. We relied on their expert
22   feedback.
23 Q Have you, since that time of that meeting this
24   December, have you gone back and tried to make any
25   kind of a determination whether that analysis that

79

1   as they relate to legislative and congressional
2   districts. Do you see that?
3 A Yes, I do.
4 Q Are you familiar with that analysis that LTSB
5   performed?
6 A I'm familiar with the analysis, yes.
7 Q Do you -- did you do any kind of review of their
8   analysis at all?
9 A LTSB provided us a limited summary of what their
10   analysis was. I believe it was like a one or
11   two-page document. Aside from that, we did have a
12   review of that summary with LTSB.
13 Q This memo at least states that that LTSB analysis,
14   and I'm reading again here from page 4, quote,
15   concluded that 4,204 voters were affected by
16   incorrect municipal boundaries, 1,071 of which
17   likely changed assembly districts, and 66 of which
18   likely changed congressional districts. Do you
19   see that?
20 A Yes, I do.
21 Q Is that a conclusion that you're familiar with?
22 A It's a conclusion that I'm -- that LTSB made based
23   upon their analysis.
24 Q Did you discuss that conclusion with anyone at
25   LTSB?

78

1   LTSB performed was in fact correct?
2 A We made some assumptions with it based upon our
3   own analysis that we did with 16 counties. We
4   used the LTSB numbers kind of as a guideline to
5   make sure that, you know, are they doing their
6   analysis right, are we doing our analysis right,
7   just to ensure that there's some kind of
8   crosscheck there.
9 Q Looking for consistency between the two
10   approaches?
11 A Some consistency or some type of pattern or
12   something like that just to ensure that the
13   analysis is being done correctly.
14 Q So has there been anything that you know of that
15   has been done since the time LTSB performed that
16   limited analysis to confirm whether 1,071 voters
17   likely changed assembly districts?
18 A I'm not aware of anything that was done.
19 Q Are you aware of anything that was done to confirm
20   whether 66 voters changed congressional districts?
21 A I'm not aware of anything that was done.
22 Q The next paragraph then refers to the analysis of
23   16 counties that you performed; is that correct?
24 A That is correct.
25 Q When did you perform that analysis?

80

20 of 56 sheets
Case 2:11-cv-00562-JPS-DPW-RMD   Filed 02/20/12   Page 20 of 56   Document 172
WWW.FORTHERECORDMADISON.COM   (608)833-0392
Page 77 to 80 of 149

1 A I performed that analysis end of December time
2   frame.
3 Q Before the new year?
4 A If I recall, yes.
5 Q Had you working over the holidays?
6 A Yep, I worked over the holidays.
7 Q What did you do specifically to perform that
8   analysis of 16 counties?
9 A The specific steps that we took to perform that
10   analysis, from the ward-based shapefiles that we
11   received from LTSB and the county-based shapefiles
12   that we -- or ward-based shapefiles that we
13   received from the county GIS, we compared those
14   two shapefiles along with the geocoded addresses
15   of those voters in those counties, and then
16   compared that to the senate, assembly,
17   congressional districts boundaries that were
18   provided to us by LTSB, to identify any types of
19   anomalies that may occur.
20 Q And the results of that analysis that you
21   performed are then shown in the paragraphs
22   numbered 1 through 5; is that correct?
23 A That is correct.
24 Q So it was your conclusion in performing that
25   analysis, and I'm looking at paragraph number 2

81

1   here, that 1,601 registered voters were placed in
2   the wrong assembly district in the WISE-LR maps,
3   correct?
4 A That is correct.
5 Q And that would have been under Act 43, correct?
6 A Not specifically. I don't know what Act 43
7   pertains to as far as --
8 Q Okay. Act 43 pertains to assembly and senate
9   districts, and Act 44 pertains to congressional
10   districts.
11 A Then that would be correct.
12 Q And paragraph 3, the conclusion is that 902
13   registered voters were placed in the wrong senate
14   district in the WISE-LR maps, correct?
15 A That is correct.
16 Q And then paragraph number 4, 12 registered voters
17   were placed in the wrong congressional district in
18   the WISE-LR maps, correct?
19 A That is correct.
20 Q Now, what kind of output or results in terms of
21   computer generated or written results were
22   prepared as part of this analysis?
23 A We generated an overall document that listed, it's
24   more summary level, of -- and this is kind of a
25   snapshot of what those were. We also provided

82

1   detailed data on which voters were impacted, the
2   number of voters impacted by the differences
3   between the county-based shapefiles and the LTSB
4   shapefiles, and those were generated and provided
5   in an Excel spreadsheet format. We also provided
6   snapshot examples, pictures depicting some
7   examples of where some of those anomalies may be
8   occurring.
9 Q So if we were to get that output, would we be able
10   to tell, for example, where the 1,601 registered
11   voters are located who were placed in the wrong
12   assembly district?
13   MR. KELLY: Objection, form.
14 A Yes, you would be able to.
15 Q And the same thing is true with the 902 registered
16   voters who were placed in the wrong senate
17   district?
18   MR. KELLY: Objection, form.
19 A Yes, that is correct.
20 Q And so if we saw the output from that analysis you
21   conducted, we would also be able to determine
22   where the 12 registered voters live who were
23   placed in the wrong congressional district?
24   MR. KELLY: Objection, form.
25 A Yes, that is correct.

83

1 Q So we would be able to then go back and tell which
2   congressional district they were placed in under
3   the WISE-LR maps and then we would be able to see
4   which congressional district they were placed in
5   if the county GIS shapefiles were used?
6 A Yes, that is correct.
7 Q Is there any information, other than what is
8   contained in the spreadsheet that you generated as
9   part of your study, that would be needed to
10   determine the districts that these voters who are
11   identified here, in these five paragraphs, were
12   under, located under the WISE-LR maps versus where
13   they are located using the county GIS shapefiles?
14 A Can you rephrase that?
15 Q Is there anything -- strike that question. Do the
16   files, whether it's the spreadsheet or whatever it
17   is that you had generated as part of this study,
18   things that have already been created, does that
19   contain all the information that would be
20   necessary to make the determinations about where
21   those voters are located, the ones who are
22   referred to in the five numbered paragraphs here?
23 A Yes, they would.
24 Q Does the spreadsheet that you created, does that
25   contain the information about which districts

84

1 these particular voters were originally assigned
2 to?
3   MR. KELLY: Objection, form.
4 A Originally assigned to referring to the LTSB --
5 Q Under the WISE-LR maps.
6 A Under the WISE-LR. Yes, it does pertain to that.
7   It has both the new district -- or both the
8   district that they belong to using the county GIS
9   map and the district they belong to using the
10   WISE-LR map.
11 Q Since the time that you conducted that 16-county
12   analysis, have you conducted any analyses of any
13   additional counties?
14 A No, I have not.
15 Q Do you know which eight counties of the 24 that
16   you expect to give you their county GIS or
17   municipal GIS shapefiles, which ones still have
18   to -- have yet to submit that to you?
19 A Specifically, I don't know off the top of my head,
20   no.
21 Q Of the 16 counties that you had performed your
22   analysis on, do you know was Milwaukee County
23   included in that?
24 A Milwaukee was not included in that.
25 Q What about Racine, was Racine included?
                        85

1 A Racine County was not included in that.
2 Q What about Kenosha?
3 A Kenosha County was not included in that.
4   MR. POLAND: Let's take about a
5   five-minute break.
6   (Recess)
7   MR. POLAND: Why don't we go back
8   on.
9 By Mr. Poland:
10 Q Mr. Meyer, when we ended, I was asking you about
11   your analysis of 16 counties that is referred to
12   in Exhibit 80. Do you recall we talked about
13   that?
14 A Yes, I do.
15 Q Did the 16 counties that you analyzed include
16   Brown County or was that not included in the
17   analysis?
18 A Brown County, I don't recall.
19 Q Is Brown County a county that you expect would
20   provide you with county GIS shapefiles for
21   district and ward maps?
22 A That I don't know.
23 Q What about Waukesha County, was that included in
24   the analysis?
25 A Waukesha County was not in the analysis.
                        86

1 Q Do you know whether Waukesha County intends to
2   submit county GIS shapefiles for district and ward
3   maps?
4 A Yes, they have.
5 Q Oh, they have already done it?
6 A Yes, they have.
7 Q And what about Outagamie County, was that included
8   in your analysis of 16 counties?
9 A I don't recall.
10 Q Have they submitted county GIS shapefiles for
11   district and ward maps to you?
12 A That I don't recall either.
13 Q Or do you know whether they intend to?
14 A That I don't know.
15 Q Wanted to ask you a slightly broader question, and
16   that is, in the process of geolocating voters, are
17   there some imperfections in that process itself?
18 A Can you clarify imperfections?
19 Q Yeah. And I'll give you the specific context.
20   There was a newspaper article that appear in the
21   Milwaukee Journal Sentinel that talked about some
22   voters being assigned to Africa or something like
23   that. Are there imperfections in the process of
24   geolocating voters that could lead to their
25   addresses being in different states or countries
                        87

1   even?
2 A There are -- this is what we term a geocode
3   exception. Specifically, I know what article
4   you're referring to. For those cases, those
5   addresses actually did not receive a geocode at
6   all. So by default, the service geocodes them at
7   the center of the earth, which is why they're off
8   the coast of Africa. Those are all corrected or
9   will be corrected as part of that process for
10   ensuring that those addresses have an accurate
11   correct geocode.
12 Q Who assigns them the center of the earth location,
13   who is it? Who does that?
14 A That was the Bing --
15 Q The Bing service did that?
16 A -- service. Correct.
17 Q Got it. Is that a default with geocoders, that
18   they would do that, or that's just particular to
19   the Bing service?
20 A It's particular to, yeah, the way we received it
21   back. I'm not sure. I can't speak to other
22   services.
23 Q I'd like to ask you about the categories now that
24   I've identified in Exhibit 86, which is the
25   deposition notice. It's on page 3 of the notice
                        88

1   itself. And so you'll see that there are seven
2   categories that are identified there?
3 A Yes.
4 Q The first category identifies any documents,
5   communications or data regarding the GAB's
6   projection for the timing or substance of a final
7   resolution of the anomalies identified in the
8   GAB's November 10, 2011 and January 13, 2012
9   memoranda attached hereto. Do you see that?
10 A Yes, I do.
11 Q And we talked a little bit here this morning about
12   expectations, the timing, when you might have a
13   final resolution of those discrepancies or
14   anomalies, correct?
15 A That is correct.
16 Q What I'm trying to do is determine whether what
17   might be in existence that would speak to those
18   issues about the timing of the substance of the
19   final resolution. Can you identify for me general
20   categories of documents, communications or data
21   that might speak to that?
22 A That I don't recall.
23 Q Do you know are there memos that have been created
24   or -- I don't know what else might be created,
25   that's why I'm asking the questions -- something

89

1   that might have been created that would speak to
2   those issues?
3 A That I don't know.
4 Q How were the -- strike that. Who was involved in
5   the discussion about trying to have this process
6   done by February 1st, for the counties that are
7   having primary elections, then by mid-March for
8   all the April elections?
9 A Who's been involved in that process has been the
10   implementation team for redistricting project
11   within SVRS.
12 Q Who's on the implementation team?
13 A Specifically?
14 Q Yes.
15 A That would be myself, Sarah Whitt, Adam Harvell,
16   Nat Robinson, Shane Falk. And that's all I
17   recall.
18 Q Were there discussions with other members of the
19   GAB itself or others, such as Kevin Kennedy's
20   name, for example, appears on the January 13th
21   memo, discussions with anyone else at the GAB
22   about the timing or what the substance might be of
23   a final resolution of those discrepancies?
24 A That I don't know.
25 Q All right. I'd like to turn your attention to the

90

1   second category of matters that are identified in
2   the notice. That asks about estimates of the
3   number of people affected or potentially affected
4   by the misalignment of municipal boundaries and
5   legislative or congressional districts, including
6   all communications to or from GAB regarding this
7   misalignment of municipal boundaries and
8   legislative or congressional districts. Do you
9   see that?
10 A Yes, I do.
11 Q What kind of documents or data or information
12   exists with respect to that particular topic?
13   Just talking generally.
14 A Generally, that would refer to the 16-county
15   analysis that we conducted. As far as
16   communications, as what I'm aware of, is what
17   memos have been sent out that are in front of us
18   now.
19 Q And then we had talked a little bit this morning
20   about some of the reports that were issued or
21   reports that might be able to be created to
22   identify people who were affected by the
23   corrections to the locations and the district
24   assignments, correct?
25 A Can you rephrase that?

91

1   MR. POLAND: Can you read it back,
2   please.
3   (Question read)
4 A That could be something that could be generated,
5   correct.
6 Q Do you have any idea when or expectation, I should
7   say, when another similar analysis or another
8   analysis similar to the analysis you performed for
9   the 16 counties might be performed?
10 A That I don't know.
11 Q Have you been asked to do any kind of an updated
12   analysis of those, that 16-county analysis you
13   performed?
14 A I have not been asked to.
15 Q Do you know who GAB has communicated with about
16   the discrepancies or anomalies in the municipal
17   ward boundaries?
18   MR. KELLY: Besides his lawyers?
19 Q Not in addition to -- well, yeah, let's set
20   lawyers to the side for the moment. Just talking
21   about the -- and you can also exclude county
22   clerks, because you've already testified about
23   communications with county clerks. Is there
24   anyone else that GAB has communicated with
25   regarding the discrepancies?

92

93

1 A That I don't know.

2 Q Have you communicated with anyone other than

3 county clerks and people within the GAB about

4 those discrepancies?

5 A No, I have not.

6 Q Have you communicated -- I'm just going to ask a

7 little bit of fact of communication. Have you

8 communicated with any lawyers about the

9 discrepancies in municipal and ward boundaries?

10 MR. KELLY: Other than the GAB's

11 lawyers.

12 A No, I have not.

13 Q And obviously you've communicated with the lawyers

14 for the defendants here in preparation for your

15 deposition, correct?

16 A Correct.

17 Q Did you communicate with any lawyers for, whether

18 representing the GAB or anyone else, before, let's

19 say before January 1st, regarding the anomalies or

20 the discrepancies in the municipal and ward

21 boundaries?

22 A Aside from the GAB attorneys, no, I have not.

23 Q And when we say GAB attorneys, we're talking about

24 the in-house --

25 A The in-house staff, correct.

94

1 Q Do you know whether estimates of the number of

2 people affected or potentially affected by these

3 discrepancies or anomalies in the municipal and

4 ward boundaries has been transmitted to any

5 members of the legislature?

6 A That I don't know.

7 Q All right. I'd like to go to the third category

8 of -- or third paragraph describing matters in the

9 notice, and that is communications between GAB and

10 anyone else regarding the causes and effects of

11 the misalignments in the case of legislative or

12 congressional districts. Do you see that?

13 A Yes, I do.

14 Q And do you know of any such communications?

15 A Aside from clerks and GAB staff and attorneys, no,

16 I am not aware of any.

17 Q All right. Paragraph number 4 identifies any

18 materials related to estimates or discussions of

19 the total population of the areas affected by the

20 misalignment of municipal boundaries and

21 legislative and congressional districts, and the

22 effects this has or may have on the respective

23 population of affected or potentially affected

24 legislative and congressional districts. Do you

25 see that?

95

1 A Yes, I do.

2 Q Are you aware of any such materials?

3 A I'm not aware of any such materials.

4 Q This would be documents or data, communications.

5 I mean, it's intended to be comprehensive when we

6 refer to materials. You're not aware of any such

7 materials?

8 A Referring to total population of areas, I'm not

9 aware of any such materials.

10 Q Paragraph number 5 -- actually, let me ask you

11 another question. Does GAB maintain any

12 population data in any of the data sets -- or

13 databases that it uses for redistricting purposes?

14 A For the purposes of redistricting, no, we don't

15 maintain population data.

16 Q Do you maintain -- does GAB maintain population

17 data for other purposes?

18 A We maintain total population data at a municipal

19 level for purposes of generating, you know,

20 different types of communications or -- for other

21 things but not related to redistricting.

22 Q All right. Paragraph number 5, materials -- asks

23 for materials regarding any registered voters

24 whose geolocation in the SVRS places or may place

25 them in a different district than the district

96

1 established for them under the face of Acts 43 and

2 44. Do you see that?

3 A Yes, I do.

4 Q And we've talked about some of those kinds of

5 materials this morning, correct?

6 A Yes, we have.

7 Q So for example, we talked about the fact that the

8 SVRS itself has been updated or revised to reflect

9 new district assignments based on corrections from

10 the county or municipal clerks, correct?

11 A Can you repeat that?

12 (Question read)

13 A Yes, we did discuss that.

14 Q And we talked about the conclusions that you

15 reached, at least preliminarily, in the analysis

16 of 16 counties that you performed that's reflected

17 in the January 13th memo, correct?

18 A That's correct.

19 Q Is there anything else that currently exists that

20 you know about, whether it's in the form of

21 memorandum or a report or an e-mail communication,

22 that specifically addresses the matter identified

23 in paragraph 5?

24 A There's nothing else that I'm aware of.

25 Q Now, before I get to paragraph number 6, I wanted

Page 97

1 to take you back to Exhibit 80, that's the

2 January 13th memo. And I'd like you to look at

3 page 5 please. There's a heading that says,

4 states, Districts Created by Acts 43 and 44 and

5 Conflict with Act 39. Do you see that?

6 A Yes, I do.

7 Q I'd like to draw your attention to the second full

8 paragraph under that heading. That paragraph

9 reads, "After the GAB and/or local clerks make

10 these corrections, the districts in SVRS may not

11 match Acts 43 and 44 precisely. In addition,

12 these corrections also require splitting census

13 blocks, which may conflict with Act 39's

14 prohibition on splitting census blocks," and then

15 it has a number of citations to Wisconsin

16 Statutes. Do you see that language?

17 A Yes, I do.

18 Q There is a reference in there to corrections, and

19 that's what I wanted to ask you about now. Do you

20 know of any discussions that GAB has had with

21 anyone about corrections that are identified in

22 that paragraph?

23 A That I don't know.

24 Q Do you know if GAB's created any kind of analysis

25 to arrive at that conclusion?

Page 98

1 A Not that I'm aware of.

2 Q And do you know whether GAB has had any

3 discussions, either internally or externally, with

4 anyone about any kind of corrective legislation?

5 A That I'm not aware of.

6 Q All right. The last category that's -- or last

7 matter identified in paragraph 7 asks about the

8 communications -- or any communications with any

9 legal counsel other than GAB's own counsel, which

10 is the DOJ and Reinhart, about the issues

11 identified in the two exhibits that we've looked

12 at here today, Exhibit 79 and 80. Are you aware

13 of any such communications?

14 A I'm not aware of any such communications.

15   MR. POLAND: Let's take a break for

16 just a second here.

17   (Short recess)

18   MR. POLAND: Mr. Meyer, we don't

19 have any further questions for you at this

20 time. Thanks very much for coming in today.

21 I appreciate it.

22   MR. HASSETT: I'll only be a couple

23 hours. No, kidding. Done.

24   MR. KELLY: I have some. I'll be

25 done by 1:00.

Page 99

1 EXAMINATION

2 By Mr. Kelly:

3 Q Mr. Meyer, I'd like to back up to the beginning as

4 it were. We're talking about census data. What

5 do you know about census data accuracy with

6 respect to their maps?

7 A In respect to the census data maps, I'm aware it's

8 accurate up to plus or minus 50 meters.

9 Q That's about 167 feet, plus or minus?

10 A Plus or minus.

11 Q So when we're talking about accuracy plus or minus

12 167 feet, that means that given where the line

13 appears to be on a map, the actual place for that

14 line might be 167 feet to the right or 167 feet to

15 the left, right?

16   MR. POLAND: Object to the form of

17 the question.

18 A Right.

19 Q And so that spans an area of approximately

20 334 feet, approximately equal to a football field;

21 yes?

22   MR. POLAND: Object to the form.

23 A Not doing the math, assuming your math is correct,

24 that would be correct.

25 Q Sure. Let's just check my math real quickly. 167

Page 100

1 times two, 334. Football field, approximately

2 100 yards, 300 feet. So we're talking about

3 approximately a football field?

4 A Correct.

5 Q So whenever we look at a line in a TIGER file,

6 what we're looking at is the line is somewhere on

7 that football field, right?

8   MR. POLAND: Object to form.

9 A That would be correct.

10 Q But we're not sure exactly where?

11 A That would be correct.

12 Q Now, when the municipalities build their wards in

13 the WISE-LR system, they're working off of these

14 TIGER lines provided by the census; is that right?

15 A That is my understanding, correct.

16 Q And those would be the lines that have an accuracy

17 of getting at least in the right football field?

18 A That would be correct.

19 Q So they build their wards by conglomerating

20 together one or more census blocks, and they call

21 that a ward?

22   MR. POLAND: Object to the form of

23 the question.

24 A Can you rephrase that?

25 Q Sure. When the municipalities go into WISE-LR to

1 create their wards, what they're doing is they're
2 picking certain census blocks and they're saying,
3 essentially, we're going to call these census
4 blocks a ward; is that about right?
5   MR. POLAND: Object to form.
6 A I'm not specifically aware of their process. I
7 would assume that that is what they are doing,
8 correct.
9   MR. POLAND: And then I'll add the
10   objection foundation.
11 Q But the wards are built out of census blocks, as
12 far as you know?
13 A That is correct.
14   MR. POLAND: Object to form.
15 Q So now, when they're complete, when they're done
16 building those wards, is the LTSB able to create,
17 for the GAB's use, shapefiles for the assembly,
18 senate, and congressional districts?
19 A Yes, the LTSB provided us senate, assembly, and
20 congressional district shapefiles.
21 Q And those shapefiles incorporate the wards as they
22 were assigned by the municipalities?
23   MR. POLAND: Object to the form,
24   foundation.
25 A That is my understanding.

101

1 Q So now, I want to explore where these errors slash
2 anomalies come from, when we're talking about
3 boundary exceptions. I want to explore how we
4 find out about those and what data is used to
5 identify them. So if you could walk me through
6 that process. And let's say we're starting with
7 the municipalities having used WISE-LR to build
8 their wards. How do they then determine that
9 there's an exception?
10 A In regards to them building those boundaries using
11 WISE-LR, from my understanding they go to their
12 local GIS and look at the differences between the
13 local GIS has for the boundary and what was
14 defined as that municipal boundary in WISE-LR.
15 Q So are they overlaying the shapefiles from the
16 WISE-LR system on top of their own GIS map?
17 A That I don't know.
18 Q Are those the two data sets that they're
19 comparing?
20   MR. POLAND: Object to the form and
21   foundation.
22 A That I don't know. I would assume that that's
23 what they were doing.
24 Q They're comparing something, right?
25   MR. POLAND: Object to form and

102

1 foundation.
2 A That's my understanding.
3 Q And what they're comparing tells them that there
4 are a certain number of registered voters that
5 they identify as boundary exceptions?
6   MR. POLAND: Objection, foundation.
7 A In regards to comparing the boundaries, I don't
8 believe they're looking at voters at that time.
9 Q What are they looking at?
10 A They're looking at the municipal boundaries and
11 the ward boundaries as defined within WISE-LR and
12 those municipal and ward boundaries as defined
13 within their local GIS.
14 Q And they're seeing a discrepancy there?
15 A That would be correct.
16 Q Do we know what the reason for the discrepancy is?
17 Does GAB know, does the municipality know?
18   MR. POLAND: Objection, foundation,
19   as to what the municipality knows.
20 A Specifically, I don't know.
21 Q Is it possible that the -- that those exceptions
22 arise from the inaccuracy of the TIGER lines?
23   MR. POLAND: Objection, form.
24 A That could be one possible explanation.
25 Q What could be other explanations?

103

1 A It could be a, the football field example
2 difference of plus or minus 50 meters where those
3 boundaries are different. Other than that, I'm
4 not aware of any, I guess, other types of
5 exceptions that may occur based upon the
6 boundaries.
7 Q Okay. The exceptions that we've been talking,
8 that Mr. Poland has been talking about, are they
9 in the nature of the football field type of error?
10   MR. POLAND: Object to the form of
11   the question.
12 A Specifically at the ones that I have personally
13 looked at, that could be one reason for those
14 types of exceptions to occur.
15 Q Have you identified any other reasons that those
16 exceptions could occur?
17 A Not at this time, no.
18 Q So to the best of your knowledge, the exceptions
19 that have been identified so far have been of the
20 football field type of exception?
21   MR. POLAND: Object to the form of
22   the question.
23 A Yeah, I mean, to my knowledge, you know, without
24 looking at a, I guess in more detail, but the
25 football field example is one type that I could

104

1   see as a possible reason for those anomalies.
2   Could another reason be the census lines are
3   wrong, greater plus or minus 50 meters. That's
4   entirely a possibility. We don't do census.
5   Census is done by the federal government. So, you
6   know, we don't know what that would actually be.
7 Q And as you mentioned, the census is done by the
8   federal government. Does the GAB have the ability
9   to change census information?
10 A No, we do not.
11 Q Do you know if the municipalities have the ability
12   to change census information?
13 A Not that I'm aware of.
14 Q When the municipalities learn of this football
15   field kind of an issue, where is this line
16   actually supposed to be, what are they supposed to
17   do?
18   MR. POLAND: Object to the form of
19   the question.
20 A What are they supposed to do or --
21 Q Uh-huh. What are they supposed to do?
22 A They're supposed to, I mean, compare that
23   assessment, and if they have a local GIS to make
24   that correction in that system, submit the correct
25   or accurate ward files to the GAB, where they

105

1   upload it into SVRS. If they don't have a local
2   GIS, they inform us of those boundary, I guess,
3   differences, and in the future we can make those
4   types of changes with regards to our boundary
5   management after the April elections.
6 Q And when we talk about making those corrections,
7   how do they know how to make the corrections?
8   MR. POLAND: Object to the form of
9   the question, foundation.
10 A Corrections as referring to the boundaries?
11 Q Uh-huh.
12 A The locals, county clerks or municipal clerks,
13   need to make those decisions based upon the data
14   that they're given and following the Acts.
15 Q So what they're trying to do, would it be accurate
16   to say, what they're trying to do is identify
17   where those census lines are actually supposed to
18   be on that football field?
19   MR. POLAND: Object to the form of
20   the question.
21 A That would be my understanding of what they're
22   supposed to be doing, correct.
23 Q Does the GAB assume that the municipalities are
24   following the law when they make those judgments?
25 A Yes, the GAB is assuming that those municipalities

106

1   are following the law.
2 Q So the GAB assumes that what the municipalities
3   are doing is engaging in a good-faith effort to
4   determine where on the football field the census
5   block lines actually are?
6   MR. POLAND: Object to the form and
7   foundation.
8 A Yes.
9 Q Mr. Poland was asking you a series of questions
10   about clerks making changes to district
11   assignments; do you recall that?
12 A Yes, I do.
13 Q Do you know what he meant by changing the district
14   assignment for a voter?
15 A I understand what he meant by that, correct.
16 Q What did he mean by that?
17 A My understanding is that changing that district
18   assignment puts that voter truly in the place
19   where they actually belong.
20 Q And when we are -- when we're trying to figure out
21   where that voter truly actually belongs, how do we
22   do that?
23 A We look at that voter's address. Look at the
24   point that the geocode placed that address on the
25   map. Ensure that that's correct and where that

107

1   address actually is on the street line. Make the
2   adjustment if necessary. And then, you know,
3   determine that that's truly where that person
4   lives.
5 Q Once you've determined where that person truly
6   lives, how do you determine where -- what district
7   he is truly in?
8   MR. POLAND: Object to the form and
9   foundation.
10 A That district -- that point is placed within the
11   shapefile of those districts.
12 Q Which shapefile, the one that has the WISE-LR
13   census block lines or the lines given to you by
14   the municipalities?
15 A In the terms of those counties that gave us
16   county-based data from their GIS system, it would
17   be from the county GIS. In terms of those that
18   have not, that would be from the WISE-LR base ward
19   definition data.
20 Q Is it true then that, when you talk about
21   determining what district a person truly belongs
22   in, you're relying on a third party to accurately
23   place the district lines?
24   MR. POLAND: Object to the form of
25   the question.

108

1 A That is correct.
2 Q And as you rely on third party to correctly place
3   the district line, your assumption, the GAB's
4   assumption is that third party is following the
5   law?
6 A That is the assumption we make, correct.
7 Q And is the GAB assuming that in following the law,
8   those third parties, whether they're a county or a
9   municipality, are not shifting population in
10   census blocks?
11   MR. POLAND: Object to the form of
12   the question and foundation.
13 A That is our understanding.
14 Q And similarly then, is it GAB's assumption that as
15   these municipalities and counties follow the law,
16   that they're not shifting populations in assembly,
17   senate, or congressional districts?
18 A That is my understanding.
19 Q Have you seen any information, in your position at
20   the GAB, to suggest that municipalities are
21   shifting population in assembly, senate, or
22   congressional districts?
23 A I have not seen any information provided to us
24   from the counties or municipalities that they
25   shift in population, no.

109

1 Q Have you seen any information, in your position at
2   the GAB, that would suggest that the
3   municipalities or GAB are changing assembly,
4   senate, or congressional district boundaries?
5 A No, I have not. We're, at the GAB, we're using
6   the senate, congressional, and legislative
7   district boundaries drawn up as given to us by
8   LTSB.
9 Q And do you know of any reason why the LTSB might
10   change an assembly, senate, or congressional
11   district boundary?
12 A I'm not aware of any, no.
13 Q Are you aware of any reason that a municipality
14   might change an assembly, senate, or congressional
15   district boundary?
16 A I'm not aware of any.
17 Q And you've not seen any of that happen?
18 A That's correct.
19 Q Let's take a look at Exhibit 79. And we'll take a
20   look at page 2. First paragraph under the heading
21   Correcting Municipal Boundaries and Wards. Six
22   lines down in that first paragraph, under that
23   heading there's a sentence that begins These
24   corrected districts; do you see that?
25 A Yes, I do.

110

1 Q So it says, "These corrected districts no longer
2   follow the census blocks." Do you have any idea
3   what the memo means by that statement?
4 A No, I do not. I would imply that that means that,
5   as drawn in WISE-LR, the census block line is not
6   inclusive of the plus or minus 50 meters, that
7   those districts no longer followed exactly.
8   That's what I'm implying out of this, but not
9   specifically, no.
10 Q So would that be suggesting that when we look at
11   that football field, the census line might, as
12   drawn by the TIGER map, might be on the 50-yard
13   line, but the municipal authority in applying this
14   puts it at the 40-yard line?
15   MR. POLAND: Objection, foundation
16   and form.
17 Q Is that the sort of thing that you think this memo
18   is describing?
19   MR. POLAND: Same objection.
20 A I can't, I guess, answer that. I didn't create
21   the memo.
22 Q Right. So you don't know -- so we really can't
23   tell, from your knowledge, what that statement in
24   this memo means?
25 A Correct.

111

1 Q And you didn't write that line?
2 A I did not write that, no.
3 Q Did you give any input into that line of text?
4 A Into that line of text, I did not.
5 Q Let's go to the second paragraph under that
6   heading, and just over halfway through that
7   paragraph, there's a line that starts In order to
8   correct this by adjusting the municipal
9   boundaries; do you see that? See if you can find
10   that?
11 A Yes, I see that.
12 Q The line says, "In order to correct this by
13   adjusting the municipal boundaries, Rock County
14   would have to shift census blocks from the town of
15   Harmony to the city of Janesville (likely negating
16   the need for that ward in the town of Harmony)
17   ignoring one entire census block (3004 which is
18   entirely in the wrong municipality) and splitting
19   another census block (3095 which is half in
20   Harmony and half in Janesville)." Do you see
21   that?
22 A Yes, I do.
23 Q Do you know what that means?
24 A Referring to this, no, I do not.
25 Q You didn't write that?

112

1 A I did not write that.
2 Q Did you have any input into that?
3 A I did not have any input into that.
4 Q Following the next sentence, "Obviously, this
5   situation also creates the likelihood of a shift
6   in the population for the city of Janesville and
7   town of Harmony under Act 43." Do you see that?
8 A Yes, I do.
9 Q Do you know what that means?
10 A I understand what it means.
11 Q What does it mean?
12 A That population and the count in the city of
13   Janesville and the town of Harmony differ.
14 Q That the population in those two municipalities
15   differ, that's what you understand that to mean?
16 A That's how I interpret it, correct.
17 Q Do you know what it means by shifting the
18   population within those two municipalities?
19 A It means that population that belonged in the city
20   of Janesville or the town of Harmony now belongs
21   in the other.
22 Q How did that happen, do you know?
23 A That I don't know.
24 Q Did you give -- you didn't write that sentence?
25 A I did not write that sentence.

113

1 Q Did you give any input into that sentence?
2 A I did not give any input into that sentence.
3 Q Let's go to page 4 of Exhibit 79. The second
4   paragraph on that page, and let's start with the
5   second sentence. Do you see where it begins The
6   corrected wards and municipal boundaries?
7 A Yes, I do.
8 Q I'll read that entire sentence. It says, "The
9   corrected wards and municipal boundaries deviate
10   from the census blocks, therefore using the
11   corrected districts could be interpreted as
12   violating the statute." Do you see that sentence?
13 A Yes, I do.
14 Q Do you understand what that means?
15 A I understand what that means.
16 Q Tell me what that means.
17 A In my interpretation, that the wards and municipal
18   boundaries that we've received from the county GIS
19   is using corrected districts that could be
20   interpreted, I guess, could be looked upon as
21   violating the statute.
22 Q Do you know who might look on that as violating
23   the statute?
24 A That I don't know.
25 Q Do you know why someone might look on that as

114

1   violating the statute?
2 A That I don't know.
3 Q When that sentence refers to corrected wards and
4   municipal boundaries deviating from the census
5   blocks, are we talking about the football field
6   type of issue?
7   MR. POLAND: Object to the form and
8   foundation.
9 A That potentially could be a reason for that.
10 Q That might be a situation where if the
11   municipality decided that, given the best
12   information available, the census block was meant
13   to follow the municipal boundary, but when you
14   overlay the two, it doesn't, that they said, Well,
15   in truth, where the census line actually is is on
16   the municipal boundary, and so that's where
17   they -- that's how they build their ward; would
18   that be about right?
19   MR. POLAND: Object to the form of
20   the question and foundation.
21 A Can you rephrase that?
22 Q Sure. So we're talking about corrected wards and
23   municipal boundaries deviating from the census
24   blocks. So what we're looking at, on the one
25   hand, is TIGER lines for the census blocks,

115

1   right --
2 A (Indicating)
3 Q -- and the other hand, we're looking at a more
4   accurate map that shows political subdivisions,
5   municipalities, towns, cities, things like that,
6   right?
7 A Correct.
8 Q And these towns and cities and municipalities,
9   they've got wards built, and they look at those
10   two and they say, Well, when we -- let's say we're
11   talking about census blocks 1001, 1002. We wanted
12   1001 and 1002 inside of ward 1. We've overlaid
13   the census, the TIGER lines on top of our map of
14   Ward 1 and, jee, golly, the line, the census line
15   doesn't quite exactly track the municipality
16   boundary, right --
17 A (Indicating)
18 Q -- and we call that an exception, a boundary
19   exception, and that's a potential to be a football
20   field kind of issue. That line is somewhere on
21   the football field, but because we're only told by
22   the census that it's somewhere on the football
23   field, we can't tell from the census exactly where
24   it is on the football field, right?
25   MR. POLAND: Objection, form of the

116

1   question.
2 A That would be correct.
3 Q So what the municipality is doing is saying, Well,
4   okay, we all know it's somewhere on the football
5   field, but we actually have to put it someplace
6   specifically on the ground, and that's what
7   they're doing?
8   MR. POLAND: Object to the form of
9   the question, foundation.
10 A That would be my interpretation of what the
11   municipality clerk would be doing.
12 Q So the ward lines, as they eventually draw them,
13   they might not match exactly where that census
14   line is on the football field, right?
15 A That would be --
16   MR. POLAND: Objection, form.
17 A That would be correct.
18 Q But it could very well be that the municipality
19   drew the line in actually the right place on the
20   football field, correct?
21   MR. POLAND: Objection, form.
22 A When using the county GIS files, that's the
23   assumption that we're making when we receive those
24   files from the local GIS.
25 Q So the GAB is assuming that the municipality
                        117

1   engaged in a good-faith effort to locate where on
2   the football field that census line was actually
3   supposed to be?
4   MR. POLAND: Objection, foundation,
5   form.
6 A That is our understanding.
7 Q All right. Let's turn to page 3 of Exhibit 79.
8   We'll look under the heading GAB Redistricting
9   Initiative in SVRS, second paragraph. There's a
10   sentence that reads, "Due to the inaccuracies of
11   the TIGER 2010 data, some boundary lines will
12   appear in the wrong place in SVRS," and then it
13   continues. The part that I read, is that the kind
14   of issue that we've been talking about, about the
15   football field kind of issue?
16 A That would be one of the reasons, correct.
17 Q Any others that you know of?
18 A Not that I'm aware of.
19 Q To your knowledge, what is the best evidence of
20   where on the football field that census block line
21   ought to be drawn in any given case?
22   MR. POLAND: Objection, form and
23   foundation.
24 A Can you rephrase that?
25 Q Sure. I'm going to put you in the position of a
                        118

1   municipal clerk for a moment. And if you can
2   answer the question, that would be great. If you
3   can't, that's fine too.
4   Let's say you're a municipal clerk and you
5   have the obligation of determining where on the
6   ground the census block line actually is, and all
7   you know is that it's somewhere on the football
8   field. How do you know where that line actually
9   is?
10   MR. POLAND: Objection, foundation.
11   Objection, form and foundation.
12 A That I don't know.
13 Q Do you know of any set of data that a municipal
14   clerk could go to to find that information?
15 A The only data that I'm aware of is their local GIS
16   system.
17 Q So given the TIGER lines from the census and their
18   local GIS information, they're responsible for
19   using their judgment for determining where that
20   census line actually is?
21 A It is our understanding that they're developing
22   their wards and their local GIS based upon that,
23   correct.
24 Q And that's the GAB's expectation for those
25   municipalities?
                        119

1 A That's correct.
2 Q And the GAB relies on those municipalities to do
3   that accurately?
4 A That is correct.
5 Q And GAB doesn't have any information available to
6   it by which it could go back and second-guess a
7   municipality on where they decided that census
8   block line actually is on the ground?
9 A There's nothing readily available to the GAB to do
10   that, correct.
11 Q Do you know if there's anything readily available
12   to anyone that would allow someone to go back and
13   second-guess a municipality on where on the
14   football field they put that census block line?
15 A That I don't know.
16 Q Let's go back to page 4 of Exhibit 79. The second
17   paragraph under the heading Use of Corrected Wards
18   in SVRS, third line down. There's this sentence:
19   "However, the statute must be violated in practice
20   in order to give a voter the correct ballot." Do
21   you see that?
22 A Yes, I do.
23 Q Do you know what that means?
24 A No, I do not.
25 Q You didn't write that?
                        120

1 A I did not write that.
2 Q Did you give any input into that text?
3 A I did not.
4 Q All right. Let's turn to Exhibit 80 for a moment.
5   And going to page 4, near the bottom of the page,
6   there's a paragraph that is followed by an
7   indentation of five numbered sentences; do you see
8   that?
9 A Yes, I do.
10 Q The paragraph begins, "The GAB conducted a more
11   comprehensive analysis of 16 counties to include
12   district lines that bisect a municipality and also
13   district boundaries for voting districts including
14   the senate districts and those below assembly
15   districts." Do you see that?
16 A Yes, I do.
17 Q Who did that comprehensive analysis?
18 A I conducted that analysis.
19 Q All right. Are the -- then those five numbered
20   lines below that, are those numbers that you
21   developed?
22 A Yes, they are.
23 Q Did you write those lines?
24 A I did not write those lines specifically in this
25   memo.

                        121

1 Q Let's look at line 1. "1,266 registered voters
2   were placed in the wrong municipality in the
3   WISE-LR maps." Do you see that?
4 A Yes, I do.
5 Q What does that mean?
6   MR. POLAND: I'm sorry, what was
7   the question, Dan?
8 Q What does that mean?
9   MR. POLAND: Objection to the form
10   and foundation.
11 A That means that when we compared the county-based
12   ward files received from -- ward files received
13   from the county GIS and the ward files received
14   from LTSB or the WISE-LR maps, we did a comparison
15   of those two, and we overlaid them. These are the
16   numbers we came up with some discrepancies where
17   those maps differed.
18 Q So this is -- is this, again, the football field
19   type of issue that we've been talking about?
20 A That could be --
21   MR. POLAND: Object to the form.
22 A That could be one explanation for it.
23 Q Are you aware of any other explanations for it?
24 A Not that I'm aware of.
25 Q Is that the same, the type of error and the reason

                        122

1   for the error, is that the same for point number
2   2?
3 A Yeah, that same logic would hold true for that as
4   well.
5 Q And for 3, 4 and 5 as well?
6 A That would be correct.
7 Q So let's -- and let's look at line 2. "1,601
8   registered voters were placed in the wrong
9   assembly district in the WISE-LR maps." What does
10   it mean to be placed in the wrong assembly
11   district? How would one know that it was wrong?
12 A The assumption that we made with regards to this
13   analysis is we assumed that the shapefiles that we
14   received, the ward-based shapefiles that we
15   received from the county GIS were more accurate.
16   So where it states that were placed in the wrong
17   assembly district means that during that
18   comparison between county-based GIS and LTSB-based
19   maps, there were 1,601 voters that -- and then we
20   layered the assembly district on top of that,
21   there were 1,601 voters that were placed into a
22   different assembly district.
23 Q And what we mean by that is that the -- let's say
24   the municipality placed their line on the 50-yard
25   line, right?

                        123

1   MR. POLAND: Object to the form of
2   the question.
3 Q Assume that to be true. Looking at the football
4   field, they put their line exactly on the 50-yard
5   line. They then compare that to the WISE-LR map,
6   and the WISE-LR map might have drawn the district
7   line, based on the census blocks, on say the
8   30-yard line, right, and we see a discrepancy
9   there?
10   MR. POLAND: Object to the form of
11   the question.
12 A That could be one reason for a discrepancy.
13 Q And are you aware of any other reasons for that
14   discrepancy?
15 A I'm not aware of any other possibilities or
16   reasons for that.
17 Q And would your expectation for the -- the GAB's
18   expectation for that municipality is looking at
19   that discrepancy, your expectation is the
20   municipality is going to look at that and say
21   where does that census line actually belong, and
22   if they come to a good-faith determination that
23   belongs on the 50-yard line, then they place the
24   voter in the correct district accordingly,
25   correct?

                        124

1   MR. POLAND: Object to the form and
2   foundation.
3 A That is our expectation of the municipal or county
4   clerks, correct.
5 Q But as far as you're aware, that doesn't mean that
6   any population has been shifted?
7   MR. POLAND: Object to the form.
8 A That I don't know.
9 Q And you're not aware of any other authority that
10   had said they're in another district and the
11   municipality simply decided, I don't like that
12   decision, I'm going to put them somewhere else,
13   you don't have any information that that's what
14   they're doing, do you?
15 A That I don't know.
16 Q And if municipalities were simply putting voters
17   in a particular district just because it's more
18   administratively easy for them, when a state act
19   says that they belong in a different district,
20   would that come to the GAB's attention?
21   MR. POLAND: Object to the form and
22   foundation.
23 A It wouldn't necessarily come to the GAB's
24   attention. We're relying, at the county and
25   municipal level, that they're making those
125

1   decisions to follow the law.
2 Q Have you come across any circumstance in your time
3   at the GAB in which you have found a municipality
4   putting a voter in a district other than the
5   district required by law?
6 A Specifically, I don't have any examples of that,
7   no.
8 Q If any of that information had come to the GAB,
9   you're the kind of person that would know about it
10   though, right?
11   MR. POLAND: Objection, foundation.
12 A From a technical perspective, if there's something
13   technical that needed to be done, I would be the
14   person that would know about it.
15 Q And you've not heard of any circumstances in which
16   a municipality has placed a voter in a district
17   other than that required by law?
18 A Not that I'm aware of that they've intentionally
19   placed them into a district, no.
20 Q Let's go back up page 4, to the first paragraph,
21   sixth line down. There's a sentence that begins
22   These corrected districts no longer strictly
23   follow; do you see that?
24 A Yes, I do.
25 Q The whole sentence is, "These corrected districts
126

1   no longer strictly follow the census blocks from
2   the TIGER and WISE-LR maps, but instead follow the
3   more accurate geography and administrative
4   boundaries that actually exist for that county."
5   Do you see that?
6 A Yes, I do.
7 Q Do you know what that means?
8 A Yes, I do.
9 Q What does that mean?
10 A It's referring to using the county-based GIS --
11   ward-based data that we received from the county
12   GIS instead of using the WISE-LR data exactly as
13   given by LTSB.
14 Q And the reason that the statement says the
15   corrected districts no longer strictly followed
16   the census blocks from the TIGER and WISE-LR maps
17   is because the author is assuming that the census
18   block line on that football field is precisely
19   accurate with where it's placed?
20   MR. POLAND: Objection to the form
21   and foundation.
22 A From that, I can't answer what the author
23   specifically refers to in that regard.
24 Q Because the author seems to be saying that the
25   districts aren't strictly following the census
127

1   block, so he's comparing two things, right?
2   MR. POLAND: Object to the form and
3   foundation.
4 A That would be correct.
5 Q What are the two things, to the best of your
6   understanding, what are the two things that he is
7   comparing to write that sentence?
8   MR. POLAND: Foundation and form.
9 A They're comparing the boundaries drawn in the
10   TIGER and WISE-LR maps to the boundaries drawn in
11   the -- from the county or local GIS system.
12 Q So when we're looking at those two lines on the
13   football field, they don't necessarily match,
14   correct?
15 A That is correct.
16   MR. POLAND: Object to the form,
17   foundation.
18 Q And that might be because we don't know exactly
19   where on that football field that census block
20   line is actually supposed to be, right?
21   MR. POLAND: Objection, form.
22 A That would be one reason, correct.
23 Q Do you know of any others?
24 A I'm not aware of any others.
25 Q The next sentence, following the one we just read,
128

Page 129

1 says, "This is similar to what local clerks have
2 done via their address ranges in SVRS in the
3 past." Do you see that?
4 A Yes, I do.
5 Q Do you know what that means?
6 A Yes, I do.
7 Q What does that mean?
8 A In my interpretation of the writing, it means that
9 previously prior to redistricting, clerks managed
10 voter districts based upon address ranges. They
11 would adjust those address ranges to the district
12 boundaries previously, similar to what they would
13 be doing with the county-based GIS files.
14 Q And is that also because TIGER lines are not
15 accurate, that they have to make those
16 corrections?
17   MR. POLAND: Objection, foundation.
18 A To the county-based GIS files?
19 Q (Indicating)
20 A That would be correct.
21 Q So this is not the first time this has come up, to
22 your knowledge?
23   MR. POLAND: Objection, foundation.
24 A To my knowledge, I wasn't at the GAB when they,
25 you know, worked with address ranges for

Page 130

1 redistricting. In the past, to my knowledge, yes.
2 Q Mr. Meyer, you've referred to some exception
3 reports that have been written; do you recall
4 that?
5 A Yes, I do.
6 Q What do those exception reports contain?
7 A The exception reports are used by the clerks for
8 accurately placing a voter in the correct location
9 where they truly belong.
10 Q And have the clerks been able to do that with
11 respect to each of the exceptions?
12 A Yes, they've been working through that process.
13 Q Is it your expectation that they will be able to
14 work through all of those exceptions and get the
15 voters assigned to their correct districts?
16 A That is correct.
17 Q Are you aware of any circumstances in which the
18 municipalities have not been able to assign a
19 voter in an exception right -- in an exception
20 report to the correct district?
21 A I'm not aware of any.
22 Q And is it the GAB's expectation that it is the --
23 that as the municipalities go through the
24 exception reports and place those voters in the
25 correct districts, that they will be following the

Page 131

1 law?
2 A That is our expectation.
3 Q And it's the GAB's expectation that in following
4 the law, they will put those voters in the
5 districts commanded by law?
6   MR. POLAND: Object to form and
7 foundation.
8 A That is our expectation.
9 Q Have you seen any information that the -- that any
10 municipality so far has placed a voter in an
11 exception report in a district other than that
12 commanded by law?
13   MR. POLAND: Object to the form and
14 foundation.
15 A I'm not aware of any.
16   MR. POLAND: Withdraw the
17 foundation objection, it's just to form.
18 Q The exception reports do, what kind of information
19 do they have on them?
20 A The different -- I can run through the different
21 types of exception reports for you.
22 Q Sure.
23 A Geocode exceptions, which would flag any address
24 that received no geocode, or the example we had
25 with the off the coast of Africa, or an inaccurate

Page 132

1 geocode would be a geocode exception. We have
2 boundary exceptions, and boundaries exceptions are
3 those addresses that are plus or minus 50 meters
4 from a boundary that a clerk has to verify that
5 that voter is truly in the correct place where he
6 belongs. And another one would be municipal
7 boundary exceptions, and we flag those as voters
8 with no district combo. So if they're registered
9 in one municipality but their geocode or boundary
10 places them in another municipality, those are
11 ones that they would have to get corrected as
12 well.
13 Q Let's concentrate for a moment on the district
14 boundary exception reports. What information is
15 contained in those?
16 A You're referring to the municipal boundary?
17 Q Whichever one that tracks the voters who are
18 within plus or minus 50 meters of a, whatever the
19 margin is, of a district boundary.
20 A Of a boundary. So a boundary exception.
21 Q Okay. So what kind of information, does it have
22 the person's name in that report?
23 A If I recall, the report has the address of that
24 voter. I believe it has the voter's name. It has
25 the distance from that boundary in meters, as to

1 how close it is to that boundary, and then what
2 district combo it's currently assigned to.
3 Q It has a street address?
4 A There is a street address, correct.
5 Q And that includes the city?
6 A That would include the city.
7 Q And the county?
8 A In that report, it would not include the county.
9 Q Is there a report that is created for boundary
10 exceptions that includes the county for the
11 affected voters?
12 A Not that I recall.
13 Q Could the -- could a report be produced for voters
14 that would have a boundary exception issue that
15 contains the county?
16 A Yes, that could be produced.
17   MR. KELLY: All right. Five
18   minutes? Break?
19   MR. POLAND: Yeah, that's fine.
20   (Recess)
21 By Mr. Kelly:
22 Q Mr. Meyer, let's take a look at Exhibit 87. Tell
23 me what that is.
24 A This is the example provided to us by the
25 Rock County clerk and GIS in regards to the town

133

1 of Harmony and the city of Janesville.
2 Q There are red lines on this all over the place.
3 Can you tell me what the red lines are?
4 A The red lines represent census blocks.
5 Q And the yellow line?
6 A Yellow line represents a municipal boundary.
7 Q And there are numbers on here as well. Can you
8 tell me what the numbers represent?
9 A The numbers in black refer to census block
10 numbers. The numbers in blue and red refer to
11 highways.
12 Q When you were looking at boundary exception
13 errors, can you pull up a map similar to this?
14 A Yes, you can. In SVRS, correct.
15 Q This is done in SVRS?
16 A This is not done in SVRS.
17 Q But SVRS can show you a map similar to this?
18 A SVRS would not show specifically this overlay.
19 SVRS is only going to show you the boundaries that
20 are loaded into SVRS.
21 Q What boundaries would those be?
22 A Those would be the ward boundaries, the
23 legislative boundaries, municipal boundaries,
24 school district boundaries, that we have
25 shapefiles for.

134

1 Q Can you then overlay those on say a Google map?
2 A Yes, you can.
3 Q So you could get a view that is similar to
4 Exhibit 87 using SVRS and Google?
5 A Correct, aside from the census blocks.
6 Q Where does the census block data come from? Is
7 there a layer for census blocks?
8 A In SVRS, no, there is not.
9 Q Where does that information come from?
10 A That comes from the U.S. Census.
11 Q And that would be in the TIGER maps?
12 A That would be in the TIGER maps, correct.
13 Q So you could overlay SVRS TIGER maps in Google and
14 get a view similar to Exhibit 87?
15 A You can't specifically do that in SVRS, but you
16 can do that in other tools that are available.
17 Q What other tools would you be able to use to get a
18 view similar to Exhibit 87?
19 A You can do that within ArcGIS software.
20 Q Is that something available to the GAB?
21 A Yes, it's a free software available to anybody.
22 Q Is that something you use?
23 A Yes, it is.
24 Q Have you used that software to produce a view
25 similar to what's represented in Exhibit 87?

135

1 A Yes, I have.
2 Q Complete with census block lines and numbers?
3 A With census block lines, correct. Specifically on
4 a printout with numbers, no.
5 Q Is it possible in viewing the map, as you're able
6 to recreate it on a computer screen, to determine
7 what census block any given piece of geography is
8 in?
9 A Yes, you can.
10 Q How do you do that?
11 A The census block is overlain on top of the Google
12 map or Bing map similar to what this shows in
13 Exhibit 87.
14 Q And by hovering your cursor over a specific spot
15 on the map, can you figure out what census block
16 number that is?
17 A Yes, you can.
18 Q I know you're not a census expert, but tell me if
19 you know this. Do you know, just in general
20 terms, about census tract and block assignments?
21 A Generally I know -- in general terms, I don't know
22 specifics of what a tract and a block actually
23 necessarily represent.
24 Q And you might not know this, and if you don't,
25 just tell me, and that's fair. Given a census

136

1 tract number and block number, would you be able	1 Q Do you know if the town of Harmony and the city of
2 to locate the area described by that census tract	2 Janesville were able to accurately determine which
3 and block number on a map?	3 districts the people who live in census blocks
4 A Yes, you can.	4 3004 and 3095 are actually in?
5 Q Is that census tract number and block number	5 A That I'm not aware of.
6 unique in the state of Wisconsin for each of those	6 Q Can they?
7 census tract and block combinations?	7 A That I'm not aware of.
8 A That is my understanding, correct.	8 Q Do you know what process they would go through in
9 Q Is it necessary for you to know what town or city	9 determining what districts those people would
10 that census block is in to find it on a map?	10 actually be in?
11 A No. You don't need to know what city.	11 A That I don't know.
12 Q So given a census tract number and block number,	12 MR. KELLY: That should do it.
13 you could go to a map and with nothing more than	13 MR. POLAND: Just a few questions.
14 that you can identify where on the map that is?	14
15 A You would have to know specifically, assuming that	15 RE-EXAMINATION
16 you're loading up a county, you would have to know	16 By Mr. Poland:
17 what county that it's in so that you can load the	17 Q I'd like you to keep Exhibit 80 out in front of
18 right data. I don't know for sure if they have	18 you. And actually, before I do that, Mr. Kelly
19 census data at a state level where you could load	19 had asked you some questions while you had
20 the whole state. That would be accurate in that	20 Exhibit 87 in front of you, and he asked if you
21 case, but I think you would have to know	21 could pull up on the screen or if you could
22 specifically a general area that you're looking to	22 generate a map that looks like this or that
23 target to find out census block and tract for.	23 layered a number of different things on it using,
24 Q So if you loaded the, let's say that that census	24 and I think you testified you could use an ArcView
25 block existed in Dane County, but you loaded	25 software?
137	139

1 Waukesha County, and you're looking for that	1 A ArcGIS.
2 census tract/block number combination, you're not	2 Q ArcGIS. And you testified that's something that
3 going to find it in that Waukesha County file,	3 you had done; is that correct?
4 right?	4 A That is correct.
5 A That's correct.	5 Q Did you actually print out or create any kinds of
6 Q The only place you can find it is if you loaded up	6 output from your computer from those maps that you
7 the right county?	7 pulled up on ArcGIS?
8 A That's correct.	8 A Yes, I did.
9 Q Have you ever seen Acts 43 or 44 before?	9 Q And are those still in existence?
10 A I have seen them. I haven't specifically read	10 A Yes, they are.
11 through them.	11 Q And so you have those, they're in the
12 Q Do you know if Acts 43 or 44 define assembly,	12 possession -- in your possession?
13 senate, and congressional districts by census	13 A That is correct.
14 blocks or wards, one or the other?	14 Q Why did you do that?
15 A It's my understanding that and what I've seen is	15 A I generated some as part of the analysis, but I
16 it defines it by census blocks.	16 also generated some other similar ones earlier
17 Q So if one wanted to know, let's say if you wanted	17 this week as well.
18 to know which congressional district census blocks	18 Q And when you say as part of the analysis, you mean
19 3004 and 3095, as they appear on Exhibit 7, are	19 the 16-county analysis that you did?
20 in, you would be able to find that in the Act if	20 A That is correct, the 16-county analysis.
21 it lists out the census block numbers in the Act?	21 Q So that would have been sometime in December?
22 A That would be correct.	22 A That is correct.
23 MR. KELLY: If I said Exhibit 7, I	23 Q Now, going to Exhibit No. 80, page 4, under the
24 meant Exhibit 87. I'm trying not to have	24 section Reports and Analyses of Municipal and Ward
25 flashbacks to the very beginning of the case.	25 Boundaries Anomalies, Mr. Kelly had asked you a
138	140

Case 2:11-cv-00562-JPS-DPW-RMD   Filed 02/20/12   Page 35 of 56   Document 172

141

1 question about one of the sentences, it's the
2 third sentence from the end, before the end of
3 that paragraph, the one that states, "These
4 corrected districts no longer strictly follow the
5 census blocks from the TIGER and WISE-LR maps, but
6 instead follow the more accurate geography and
7 administrative boundaries that actually exist for
8 county." Do you see that?
9 A Yes, I do.
10 Q Now, specifically the reference to the more
11   accurate geography and administrative boundaries
12   that actually exist for that county, that refers
13   to the county-based GIS data that the counties and
14   municipal clerks send to the GAB, correct?
15 A That is correct.
16 Q So the GAB is making an assumption that that data
17   coming from the county is more accurate than the
18   census blocks from the TIGER and WISE-LR maps,
19   correct?
20 A That is correct.
21 Q How much effort is going into this whole process
22   of trying to go through and correct these or
23   account for these anomalies?
24 A Can you quantify that?
25 Q It's happening over a period of months, right?

142

1 A That is correct.
2 Q How many people are involved in this process?
3 A A lot.
4 Q You've got clerks from municipalities and counties
5   around the state, correct?
6 A That is correct.
7 Q And people who work on the staff in the GAB,
8   correct?
9 A That is correct.
10 Q Is it your assumption that the GAB would not be
11   going through this entire process if it weren't
12   going to yield a more accurate result?
13 A That is absolutely correct.
14 Q Turning to page -- actually we're on the same
15   page. It's page 4 of Exhibit 80. The numbered
16   paragraphs toward the bottom of that page that
17   Mr. Kelly had asked you about, looking at line
18   number 2 which states, "1,601 registered voters
19   were placed in the wrong assembly districts in the
20   WISE-LR maps." Do you see that statement?
21 A Yes, I do.
22 Q That means that 1,601 registered voters who were
23   placed in a specific assembly district under
24   Act 43, once the corrected data are uploaded into
25   the SVRS, those 1,601 registered voters would be

143

1 placed into a different assembly district,
2 correct?
3   MR. KELLY: Objection, form.
4 A This doesn't refer to anything in regards to SVRS.
5   It refers to the analysis that was conducted
6   comparing the ward-based shapefiles from county
7   GIS and LTSB's WISE-LR maps, and then layering
8   that assembly district on top of that, and those
9   1,601 voters are represented as the difference of
10   where those voters were placed.
11 Q In other words -- let me ask it a different way --
12   Act 43 and the boundaries under Act 43 were
13   determined based on WISE-LR data, correct?
14   MR. KELLY: Objection, form.
15 A That is my understanding.
16 Q All right. And so there were 1,601 registered
17   voters -- this is under your analysis -- who under
18   Act 43 were put into a specific assembly district,
19   and now, based on the corrected data, they
20   would -- their locations would be in a different
21   assembly district, correct?
22   MR. KELLY: Objection, form.
23 A No, what the analysis compared was the placement
24   of those voters in a ward which makes up that
25   assembly district. In terms of elections, SVRS

144

1 and election management uses wards as our base
2 layer for making up the above layers such as
3 senate, assembly, and congressional district, and
4 those 1,601 voters were placed -- were different
5 between the county GIS data and the LTSB-based
6 data.
7 Q Right. And so the SVRS has changed for those
8   voters as a result of this process of resolving
9   the discrepancies, correct?
10   MR. KELLY: Objection, form.
11 A In terms of this analysis, SVRS has not changed.
12   The analysis was conducted independently of SVRS.
13 Q There are changes that have been made to the SVRS
14   as a result of the process of attempting to
15   resolve these discrepancies or anomalies, correct?
16   Not referring specifically to on this page, I'm
17   just asking the general question.
18 A When you're referring to anomalies, I guess what
19   do you mean by anomalies?
20 Q Well, as used in the memos that we've looked at or
21   the discrepancies that are municipal and ward
22   boundaries anomalies.
23 A Sure, if you're referring to exceptions that
24   place -- that the clerk has to do to place the
25   voter in the truly correct place that they belong,

Page 145

1   or differences in ward boundaries or school

2   district boundaries, yes, those have been made in

3   SVRS.

4 Q And so that the, you just testified I think that

5   the SVRS was not involved in the analysis, the

6   16-county analysis that you performed, correct?

7 A That is correct. What came from the SVRS was the

8   geocode of those addresses for the voters. The

9   analysis was conducted independently of the SVRS

10   tool itself.

11 Q And this is to try to get a handle on the problem,

12   the discrepancies and the magnitude of them?

13 A That is correct.

14 Q And I know you said that you were not involved in

15   redistricting before September 2011, correct?

16 A That is correct.

17 Q Is it your understanding that this redistricting

18   in 2011 is the very first one ever in Wisconsin

19   history to use the census data to accomplish -- or

20   the census blocks as the basis for the boundaries,

21   district boundaries as opposed to how it's been

22   done in the past done?

23   MR. KELLY: Objection, form.

24 A That is my understanding.

25 Q So it's your understanding in the past that it was

Page 146

1   the municipal and county -- strike that. In the

2   past, it was the wards as determined by the

3   municipalities and the counties that were used as

4   the building blocks for the assembly and senate

5   and congressional districts, true?

6   MR. KELLY: Objection, form.

7 A That is my understanding.

8   MR. POLAND: All right. No other

9   questions.

10

11   EXAMINATION

12 By Mr. Hassett:

13 Q Mr. Meyer, if you recall, what 16 counties did you

14   analyze?

15 A Offhand, I can't recall specifically.

16 Q What's your best recollection of as many as you

17   can recall?

18 A Without looking it up, I mean, we did Rock County,

19   Dane County, Monroe County, La Crosse County, and

20   Marathon County, Fond du Lac County, Vilas County,

21   I believe, from my recollection, that's what I

22   recall.

23 Q And how did you pick those 16 out?

24 A The 16 counties that we used were actually the

25   county GIS shapefiles that we received from the

Page 147

1   local GIS. While we received more than that at

2   the time of the memo, we chose to use those 16

3   because those were the ones that we could

4   accurately get to do a comparison with.

5   MR. HASSETT: All right. I have

6   nothing further.

7   MR. POLAND: Nothing further here.

8   MR. KELLY: Nothing further for us.

9   Thank you.

10   (Adjourning at 12:47 p.m.)

Page 148

1 STATE OF WISCONSIN)

) ss.

2 COUNTY OF DANE   )

3   I, SARAH FINLEY PELLETTER, a Registered

4 Professional Reporter and Notary Public duly

5 commissioned and qualified in and for the State of

6 Wisconsin, do hereby certify that pursuant to notice,

7 there came before me on the 25th day of January 2012,

8 at 9:03 in the forenoon, at the offices of

9 Lawton & Cates, S.C., Attorneys at Law, Ten East Doty

10 Street, Suite 400, the City of Madison, County of

11 Dane, and State of Wisconsin, the following named

12 person, to wit: DAVID J. MEYER, who was by me duly

13 sworn to testify to the truth and nothing but the

14 truth of his knowledge touching and concerning the

15 matters in controversy in this cause; that he was

16 thereupon carefully examined upon his oath and his

17 examination reduced to typewriting with

18 computer-aided transcription; that the deposition is

19 a true record of the testimony given by the witness;

20 and that reading and signing was not waived.

21   I further certify that I am neither

22 attorney or counsel for, nor related to or employed

23 by any of the parties to the action in which this

24 deposition is taken and further that I am not a

25 relative or employee of any attorney or counsel

```
 1  employed by the parties hereto or financially
 2  interested in the action.
 3          In witness whereof I have hereunto set my
 4  hand and affixed my notarial seal this 26th day of
 5  January 2012.
 6
 7  _____
                        Notary Public, State of Wisconsin
 8                      Registered Professional Reporter

 9
    My commission expires
10  July 15, 2012

11

12

13

14

15

16

17

18

19

20

21

22

23

24
25
                        149
```

WWW.FORTHERECORDMADISON.COM   (608) 833-0392

0

0.1 [1] - 73:13

1

1 [5] - 57:20, 81:22, 116:12, 116:14, 122:1
1,000 [1] - 35:23
1,071 [2] - 78:16, 80:16
1,266 [1] - 122:1
1,601 [11] - 82:1, 83:10, 123:7, 123:19, 123:21, 142:18, 142:22, 142:25, 143:9, 143:16, 144:4
10 [3] - 35:23, 38:13, 89:8
100 [2] - 35:23, 100:2
1000 [1] - 5:10
1001 [2] - 116:11, 116:12
1002 [2] - 116:11, 116:12
10th [6] - 46:5, 49:10, 49:11, 59:19, 66:16, 70:19
11-CV-1011 [1] - 2:11
11-CV-562 [1] - 1:12
115 [1] - 22:12
12 [3] - 9:9, 82:16, 83:22
120 [1] - 22:12
12:47 [1] - 147:10
12th [2] - 9:10, 9:11
13 [2] - 49:19, 89:8
13th [9] - 50:6, 50:9, 63:13, 64:20, 65:17, 70:22, 90:20, 96:17, 97:2
146 [1] - 3:6
15 [2] - 35:23, 149:10
16 [20] - 49:14, 49:23, 49:24, 50:4, 65:12, 80:3, 80:23, 81:8, 85:21, 86:11, 86:15, 87:8, 92:9, 96:16, 121:11, 146:13, 146:23, 146:24, 147:2
16-county [6] - 85:11, 91:14, 92:12, 140:19, 140:20, 145:6
167 [6] - 45:16, 99:9, 99:12, 99:14, 99:25
17 [1] - 5:7

2

19 [1] - 77:22
1:00 [1] - 98:25
1st [4] - 28:17, 57:22, 90:6, 93:19

2 [8] - 8:18, 59:1, 65:22, 81:25, 110:20, 123:2, 123:7, 142:18
20 [3] - 35:23, 66:5, 66:11
200 [8] - 46:9, 46:22, 47:7, 47:15, 70:14, 70:24, 71:7, 71:11
2000 [2] - 42:4, 43:23
2010 [9] - 42:2, 42:6, 43:20, 45:12, 45:14, 46:11, 70:15, 74:10, 118:11
2011 [9] - 9:9, 15:5, 27:25, 38:13, 43:6, 67:15, 89:8, 145:15, 145:18
2012 [7] - 1:20, 4:13, 49:19, 89:8, 148:7, 149:5, 149:10
21 [4] - 59:11, 59:19, 59:21, 60:18
2100 [1] - 5:10
2266 [1] - 4:23
23rd [1] - 51:8
24 [7] - 50:13, 59:25, 60:19, 66:11, 66:20, 69:6, 85:15
25 [1] - 1:20
25th [2] - 4:13, 148:7
26th [1] - 149:4

3

3 [8] - 8:19, 51:16, 51:19, 67:5, 82:12, 88:25, 118:7, 123:5
30-yard [1] - 124:8
300 [1] - 100:2
3004 [5] - 52:20, 74:9, 112:17, 138:19, 139:4
3059 [1] - 52:21
3095 [4] - 74:8, 112:19, 138:19, 139:4
334 [2] - 99:20, 100:1
39 [2] - 3:14, 97:5
39's [1] - 97:13

4

4 [17] - 18:5, 59:9, 65:21, 69:13, 70:5, 73:1, 77:9, 78:14, 82:16, 94:17, 114:3, 120:16, 121:5, 123:5, 126:20, 140:23, 142:15
4,204 [2] - 78:15, 79:3
40-yard [1] - 111:14
400 [3] - 4:11, 5:3, 148:10
43 [36] - 9:16, 10:19, 43:7, 43:10, 48:8, 48:16, 49:2, 51:20, 53:17, 54:1, 54:5, 54:8, 54:18, 54:22, 55:3, 55:9, 63:1, 63:5, 71:23, 72:3, 74:14, 74:17, 77:14, 82:5, 82:6, 82:8, 96:1, 97:4, 97:11, 113:7, 138:9, 138:12, 142:24, 143:12, 143:18
44 [26] - 9:16, 10:19, 43:7, 43:10, 51:20, 53:17, 54:1, 54:5, 54:8, 54:18, 54:22, 55:3, 55:9, 63:1, 63:6, 71:23, 72:3, 74:14, 74:17, 77:14, 82:9, 96:2, 97:4, 97:11, 138:9, 138:12

5

5 [6] - 81:22, 95:10, 95:22, 96:23, 97:3, 123:5
5/139 [1] - 3:4
50 [13] - 25:12, 26:5, 29:23, 34:17, 45:15, 45:19, 45:20, 99:8, 104:2, 105:3, 111:6, 132:3, 132:18
50-yard [4] - 111:12, 123:24, 124:4, 124:23
500 [1] - 4:20
505 [1] - 4:23
528 [1] - 73:14
53202 [3] - 4:23, 5:10, 5:14
53703 [3] - 4:20, 5:4, 5:7
5th [1] - 58:1

6

6 [1] - 96:25
60 [2] - 29:23, 34:17
60,000 [2] - 36:1, 36:5
64 [1] - 3:15
66 [2] - 78:17, 80:20

7

7 [3] - 98:7, 138:19, 138:23
72 [2] - 3:13, 69:9
777 [1] - 5:13
79 [20] - 3:14, 3:19, 38:5, 38:8, 38:12, 38:13, 38:15, 38:16, 38:19, 38:21, 39:1, 39:24, 40:20, 42:1, 51:17, 98:12, 110:19, 114:3, 118:7, 120:16

8

8 [1] - 3:12
80 [16] - 3:15, 3:19, 63:12, 63:17, 64:17, 65:4, 70:6, 73:11, 77:9, 86:12, 97:1, 98:12, 121:4, 139:17, 140:23, 142:15
85 [3] - 34:23, 35:7, 36:2
86 [6] - 3:12, 3:18, 8:5, 8:9, 8:23, 88:24
87 [20] - 3:13, 3:18, 72:17, 72:18, 72:21, 72:24, 73:4, 73:5, 73:7, 73:19, 74:7, 76:11, 133:22, 135:4, 135:14, 135:18, 135:25, 136:13, 138:24, 139:20

9

902 [2] - 82:12, 83:15
99 [1] - 3:5
9:03 [2] - 4:14, 148:8

A

ability [2] - 105:8, 105:11
able [25] - 19:23, 20:18, 37:3, 47:17,

49:14, 59:2, 76:25, 79:12, 79:15, 79:19, 83:9, 83:14, 83:21, 84:1, 84:3, 91:21, 101:16, 130:10, 130:13, 130:18, 135:17, 136:5, 137:1, 138:20, 139:2
absentee [2] - 11:13, 28:12
absolutely [1] - 142:13
accomplish [1] - 145:19
according [4] - 45:12, 52:3, 74:18, 74:21
accordingly [1] - 124:24
account [1] - 141:23
Accountability [8] - 1:14, 2:2, 2:13, 2:16, 4:4, 6:4, 8:21, 9:1
accountability [1] - 40:3
accuracy [6] - 45:14, 46:18, 67:6, 99:5, 99:11, 100:16
accurate [25] - 13:21, 19:25, 25:5, 43:22, 45:3, 45:6, 45:8, 62:2, 66:7, 67:18, 69:4, 88:10, 99:8, 105:25, 106:15, 116:4, 123:15, 127:3, 127:19, 129:15, 137:20, 141:6, 141:11, 141:17, 142:12
accurately [6] - 59:15, 108:22, 120:3, 130:8, 139:2, 147:4
achieved [1] - 45:17
acquired [1] - 16:25
act [8] - 48:8, 54:21, 82:9, 97:5, 97:13, 125:18, 138:20, 138:21
Act [12] - 48:16, 49:2, 54:22, 55:3, 82:5, 82:6, 82:8, 113:7, 142:24, 143:12, 143:18
action [3] - 61:23, 148:23, 149:2
active [1] - 13:16
acts [6] - 9:16, 10:19, 52:2, 106:14, 138:9, 138:12
Acts [19] - 43:7,

43:10, 51:20, 53:17, 54:1, 54:5, 54:8, 54:18, 55:9, 63:1, 63:5, 71:23, 72:3, 74:14, 74:17, 77:14, 96:1, 97:4, 97:11

actual [3] - 40:11, 57:25, 99:13

Adam [1] - 90:15

add [1] - 101:9

addition [4] - 76:8, 76:9, 92:19, 97:11

additional [8] - 24:24, 24:25, 50:10, 50:12, 50:24, 70:21, 75:16, 85:13

address [30] - 12:5, 12:11, 12:16, 13:1, 13:2, 14:23, 15:9, 15:12, 18:8, 18:9, 19:5, 19:7, 19:9, 23:20, 24:1, 26:2, 28:22, 57:3, 57:6, 107:23, 107:24, 108:1, 129:2, 129:10, 129:11, 129:25, 131:23, 132:23, 133:3, 133:4

addresses [42] - 11:22, 13:15, 13:17, 13:18, 13:20, 13:22, 17:25, 18:14, 18:18, 19:3, 19:12, 19:15, 19:20, 21:4, 24:16, 25:4, 25:6, 26:5, 30:16, 46:9, 46:23, 46:25, 47:7, 47:15, 47:18, 47:19, 57:4, 67:16, 70:14, 70:24, 71:7, 71:8, 71:11, 75:1, 75:10, 81:14, 87:25, 88:5, 88:10, 96:22, 132:3, 145:8

Adjourning [1] - 147:10

adjust [2] - 59:2, 129:11

adjusting [3] - 55:13, 112:8, 112:13

adjustment [1] - 108:2

administer [1] - 11:12

administered [1] - 42:11

administers [1] - 42:18

administration [2] - 21:15, 39:11

administrative [4] -

44:2, 127:3, 141:7, 141:11

administratively [1] - 125:18

advantage [1] - 66:6

adverse [1] - 57:6

advise [1] - 25:24

affected [12] - 34:21, 49:12, 78:15, 91:3, 91:22, 94:2, 94:19, 94:23, 133:11

affecting [1] - 71:23

affixed [1] - 149:4

Africa [3] - 87:22, 88:8, 131:25

age [1] - 4:2

ago [1] - 25:21

aided [1] - 148:18

al [4] - 4:3, 4:5, 4:21, 4:24

aldermanic [3] - 21:19, 60:9, 61:1

allow [2] - 45:7, 120:12

allows [1] - 45:21

alter [1] - 63:4

altering [1] - 55:8

altogether [2] - 29:22, 29:23

ALVIN [1] - 1:3

Alvin [2] - 4:3, 4:21

AMY [1] - 1:7

analyses [5] - 69:14, 70:4, 72:6, 85:12, 140:24

analysis [75] - 46:8, 46:17, 47:22, 49:14, 49:16, 50:4, 53:3, 53:6, 61:6, 65:12, 69:22, 69:23, 70:6, 70:11, 70:21, 70:25, 73:1, 73:10, 77:22, 78:4, 78:6, 78:8, 78:10, 78:13, 78:23, 79:2, 79:7, 79:12, 79:16, 79:25, 80:3, 80:6, 80:13, 80:16, 80:22, 80:25, 81:1, 81:8, 81:10, 81:20, 81:25, 82:22, 83:20, 85:12, 85:22, 86:11, 86:17, 86:24, 86:25, 87:8, 91:15, 92:7, 92:8, 92:12, 96:15, 97:24, 121:11, 121:17, 121:18, 123:13, 140:15, 140:18, 140:19, 140:20, 143:5, 143:17, 143:23,

144:11, 144:12, 145:5, 145:6, 145:9

analyst [1] - 39:8

analyze [2] - 36:13, 146:14

analyzed [1] - 86:15

analyzing [1] - 37:6

anomalies [30] - 25:17, 27:13, 64:24, 65:3, 65:8, 65:10, 65:12, 65:13, 65:23, 69:15, 69:17, 69:19, 69:24, 70:5, 76:18, 81:19, 83:7, 89:7, 89:14, 92:16, 93:19, 94:3, 102:2, 105:1, 140:25, 141:23, 144:15, 144:18, 144:19, 144:22

anomaly [2] - 72:13, 72:25

answer [15] - 7:7, 7:8, 19:13, 29:3, 32:8, 37:7, 38:16, 44:13, 47:5, 48:18, 53:23, 111:20, 119:2, 127:22

answers [2] - 6:25, 7:2

anticipation [1] - 58:23

apart [1] - 13:3

apparent [1] - 67:15

appear [3] - 87:20, 118:12, 138:19

appeared [1] - 67:12

appearing [6] - 4:20, 4:23, 5:4, 5:7, 5:11, 5:14

application [1] - 12:5

applying [1] - 111:13

appreciate [1] - 98:21

approaches [1] - 80:10

April [7] - 28:18, 29:20, 35:9, 51:12, 59:7, 90:8, 106:5

ArcGIS [1] - 135:19

arcGIS [3] - 140:1, 140:2, 140:7

arcview [1] - 139:24

area [7] - 73:24, 75:17, 76:12, 76:24, 99:19, 137:2, 137:22

areas [6] - 9:5, 20:10, 51:12, 76:19, 94:19, 95:8

arise [1] - 103:22

arisen [1] - 40:10

arrival [1] - 14:10

arrive [1] - 97:25

article [2] - 87:20, 88:3

aside [4] - 78:11, 93:22, 94:15, 135:5

assembly [50] - 16:6, 22:9, 24:7, 36:8, 36:16, 36:23, 37:8, 37:21, 47:2, 52:12, 52:19, 54:9, 54:12, 54:15, 55:13, 60:9, 60:24, 63:4, 71:23, 75:3, 78:17, 79:3, 80:17, 81:16, 82:2, 82:8, 83:12, 101:17, 101:19, 109:16, 109:21, 110:3, 110:10, 110:14, 121:14, 123:9, 123:10, 123:17, 123:20, 123:22, 138:12, 142:19, 142:23, 143:1, 143:8, 143:18, 143:21, 143:25, 144:3, 146:4

assess [1] - 27:2

assessing [1] - 66:14

assessment [2] - 71:12, 105:23

assign [2] - 24:15, 130:18

assigned [25] - 14:24, 23:17, 23:19, 23:24, 24:1, 24:3, 24:4, 24:7, 24:10, 32:5, 33:24, 36:15, 36:24, 37:12, 37:14, 54:5, 54:24, 57:17, 63:10, 85:1, 85:4, 87:22, 101:22, 130:15, 133:2

assignment [6] - 30:20, 32:5, 32:10, 37:10, 107:14, 107:18

assignments [11] - 30:10, 30:14, 30:19, 33:12, 61:15, 61:17, 62:21, 91:24, 96:9, 107:11, 136:20

assigns [1] - 88:12

Assistant [1] - 5:6

associated [7] - 12:12, 17:5, 17:6, 23:14, 23:17, 60:15, 73:8

assume [4] - 101:7, 102:22, 106:23, 124:3

assumed [1] - 123:13

assumes [1] - 107:2

assuming [7] - 53:1, 99:23, 106:25, 109:7, 117:25, 127:17, 137:15

assumption [8] - 109:3, 109:4, 109:6, 109:14, 117:23, 123:12, 141:16, 142:10

assumptions [1] - 80:2

assure [1] - 62:3

attached [3] - 3:18, 3:19, 89:9

attempting [1] - 144:14

attendant [1] - 16:13

attention [8] - 40:2, 46:13, 51:18, 66:1, 90:25, 97:7, 125:20, 125:24

Attorney [7] - 3:25, 4:19, 4:22, 5:2, 5:6, 5:9, 5:12

attorney [2] - 148:22, 148:25

Attorneys [6] - 4:11, 4:19, 5:3, 5:10, 5:13, 148:9

attorneys [4] - 7:6, 93:22, 93:23, 94:15

attributed [2] - 48:8, 77:14

author [3] - 127:17, 127:22, 127:24

authority [2] - 111:13, 125:9

autobound [1] - 64:12

available [8] - 57:22, 115:12, 120:5, 120:9, 120:11, 135:16, 135:20, 135:21

Avenue [2] - 4:23, 5:13

avoid [1] - 62:3

aware [43] - 29:8, 48:22, 49:4, 51:5, 51:14, 75:6, 76:16, 80:18, 80:19, 80:21, 91:16, 94:16, 95:2, 95:3, 95:6, 95:9, 96:24, 98:1, 98:5, 98:12, 98:14, 99:7, 101:6, 104:4, 105:13, 110:12, 110:13, 110:16, 118:18, 119:15, 122:23, 122:24, 124:13,

2

124:15, 125:5, 125:9, 126:18, 128:24, 130:17, 130:21, 131:15, 139:5, 139:7

B

background [2] - 64:3, 64:4
BALDUS [1] - 1:3
Baldus [2] - 4:3, 4:21
BALDWIN [1] - 1:10
ballot [1] - 120:20
ballots [2] - 11:14, 28:13
BARBERA [1] - 1:3
BARLAND [2] - 1:16, 2:15
base [6] - 21:20, 21:21, 43:15, 50:22, 108:18, 144:1
based [60] - 12:20, 13:13, 14:25, 17:20, 17:22, 19:19, 28:22, 41:15, 46:10, 46:24, 49:25, 50:1, 50:8, 50:15, 50:16, 50:21, 51:7, 52:14, 54:11, 58:17, 59:13, 60:19, 61:14, 62:20, 62:21, 62:22, 63:9, 65:14, 65:15, 67:18, 70:1, 70:2, 70:15, 71:3, 78:22, 80:2, 81:10, 81:11, 81:12, 83:3, 96:9, 104:5, 106:13, 108:16, 119:22, 122:11, 123:14, 123:18, 124:7, 127:10, 127:11, 129:10, 129:13, 129:18, 141:13, 143:6, 143:13, 143:19, 144:5
Based [2] - 46:8, 70:10
basis [3] - 56:9, 56:18, 145:20
batches [1] - 19:2
became [1] - 67:15
BECHEN [1] - 1:3
become [1] - 23:9
beforehand [2] - 29:15, 29:16
begin [1] - 27:22
beginning [3] - 32:14, 99:3, 138:25
begins [4] - 110:23, 114:5, 121:10, 126:21

begun [2] - 14:16, 58:5
behalf [7] - 4:2, 4:20, 4:23, 5:4, 5:7, 5:11, 5:14
belatedly [1] - 37:17
BELL [1] - 1:7
belong [9] - 33:25, 34:1, 85:8, 85:9, 107:19, 124:21, 125:19, 130:9, 144:25
belonged [2] - 32:13, 113:19
belongs [7] - 60:23, 60:25, 107:21, 108:21, 113:20, 124:23, 132:6
below [2] - 121:14, 121:20
best [8] - 39:21, 74:5, 76:1, 104:18, 115:11, 118:19, 128:5, 146:16
between [13] - 21:25, 22:2, 22:8, 40:18, 65:13, 73:12, 76:14, 80:9, 83:3, 94:9, 102:12, 123:18, 144:5
BIENDSEIL [1] - 1:3
bing [12] - 17:13, 19:3, 19:16, 19:25, 20:4, 20:9, 20:19, 21:1, 88:14, 88:15, 88:19, 136:12
Bing [2] - 18:21, 19:1
bisect [1] - 121:12
bit [9] - 7:17, 7:20, 9:6, 16:12, 37:6, 67:2, 89:11, 91:19, 93:7
black [1] - 134:9
block [33] - 17:22, 60:22, 107:5, 108:13, 111:5, 112:17, 112:19, 115:12, 118:20, 119:6, 120:8, 120:14, 127:18, 128:1, 128:19, 134:9, 135:6, 136:2, 136:3, 136:7, 136:11, 136:15, 136:20, 136:22, 137:1, 137:3, 137:5, 137:7, 137:10, 137:12, 137:23, 137:25, 138:21
blocks [43] - 40:11, 40:18, 48:9, 51:22, 52:4, 52:15, 52:20, 53:1, 53:10, 60:5, 71:22, 73:15, 74:6, 74:8, 77:15, 97:13,

97:14, 100:20, 101:2, 101:4, 101:11, 109:10, 111:2, 112:14, 114:10, 115:5, 115:24, 115:25, 116:11, 124:7, 127:1, 127:16, 134:4, 135:5, 135:7, 138:14, 138:16, 138:18, 139:3, 141:5, 141:18, 145:20, 146:4
blue [1] - 134:10
Board [8] - 1:14, 2:2, 2:13, 2:16, 4:5, 6:4, 8:21, 9:1
board's [1] - 40:3
BOERNER [1] - 5:9
books [2] - 28:13, 53:13
BOONE [2] - 1:4
bottom [5] - 8:18, 41:7, 65:22, 121:5, 142:16
boundaries [122] - 10:20, 15:13, 15:16, 15:20, 15:22, 16:3, 16:7, 16:11, 16:13, 16:16, 16:20, 16:24, 17:3, 17:16, 17:19, 21:8, 21:13, 23:3, 23:5, 23:7, 23:9, 23:14, 24:11, 25:2, 25:3, 25:11, 25:12, 31:20, 34:3, 40:12, 40:19, 42:19, 42:21, 43:6, 43:10, 44:2, 44:3, 44:6, 44:11, 44:23, 44:25, 45:2, 46:6, 46:20, 52:3, 52:7, 52:11, 52:13, 53:11, 53:12, 54:8, 54:10, 54:11, 55:9, 55:14, 58:14, 59:3, 59:13, 60:8, 62:22, 63:5, 63:8, 64:25, 66:8, 69:15, 70:5, 71:3, 71:5, 71:21, 76:14, 76:15, 77:24, 77:25, 78:16, 81:17, 91:4, 91:7, 92:17, 93:9, 93:21, 94:4, 94:20, 102:10, 103:7, 103:10, 103:11, 103:12, 104:3, 104:6, 106:10, 110:4, 110:7, 110:21, 112:9, 112:13, 114:6, 114:9, 114:18, 115:4, 115:23, 121:13, 127:4, 128:9, 128:10,

129:12, 132:2, 134:19, 134:21, 134:22, 134:23, 134:24, 140:25, 141:7, 141:11, 143:12, 144:22, 145:1, 145:2, 145:20, 145:21
boundary [59] - 3:13, 15:24, 21:14, 25:9, 25:13, 26:3, 26:4, 26:6, 26:9, 26:18, 31:6, 34:20, 34:24, 35:2, 35:25, 40:14, 40:16, 40:21, 40:24, 41:19, 45:22, 57:15, 57:18, 58:8, 58:16, 59:3, 59:4, 59:5, 62:2, 73:12, 73:24, 102:3, 102:13, 102:14, 103:5, 106:2, 106:4, 110:11, 110:15, 115:13, 115:16, 116:16, 116:18, 118:11, 132:2, 132:4, 132:7, 132:9, 132:14, 132:16, 132:19, 132:20, 132:25, 133:1, 133:9, 133:14, 134:6, 134:12
BOYNTON [1] - 4:22
break [7] - 7:13, 7:14, 36:5, 63:15, 86:5, 98:15, 133:18
BRENNAN [2] - 1:15, 2:14
BRETT [1] - 1:5
broader [1] - 87:15
brought [1] - 40:2
brown [3] - 86:16, 86:18, 86:19
budget [1] - 10:5
build [4] - 100:12, 100:19, 102:7, 115:17
building [5] - 60:5, 60:22, 101:16, 102:10, 146:4
built [3] - 51:21, 101:11, 116:9
BUMPUS [1] - 1:4
Bureau [2] - 42:12, 42:17
business [3] - 39:8, 39:12

C

CANE [2] - 1:15, 2:14
capacity [2] - 1:14,

2:13
caption [2] - 55:16, 65:23
Caption [1] - 1:17
captioned [1] - 46:6
carefully [1] - 148:16
CARLENE [1] - 1:3
Case [1] - 2:11
case [5] - 73:11, 94:11, 118:21, 137:21, 138:25
cases [5] - 19:24, 45:17, 45:18, 57:11, 88:4
categories [3] - 88:23, 89:2, 89:20
category [4] - 89:4, 91:1, 94:7, 98:6
Cates [2] - 4:10, 148:9
CATES [1] - 5:3
caused [1] - 73:14
causes [1] - 94:10
CECELIA [1] - 1:7
census [119] - 12:23, 12:24, 13:4, 17:13, 17:21, 17:22, 40:11, 40:18, 41:9, 41:13, 41:21, 41:24, 42:2, 42:5, 42:6, 42:9, 43:11, 43:20, 45:12, 48:9, 51:22, 52:4, 52:14, 52:20, 52:25, 53:10, 59:13, 71:22, 73:14, 73:15, 74:6, 74:8, 74:10, 77:15, 97:12, 97:14, 99:4, 99:5, 99:7, 100:14, 100:20, 101:2, 101:3, 101:11, 105:2, 105:4, 105:5, 105:7, 105:9, 105:12, 106:17, 107:4, 108:13, 109:10, 111:2, 111:5, 111:11, 112:14, 112:17, 112:19, 114:10, 115:4, 115:12, 115:15, 115:23, 115:25, 116:11, 116:13, 116:14, 116:22, 116:23, 117:13, 118:2, 118:20, 119:6, 119:17, 119:20, 120:7, 120:14, 124:7, 124:21, 127:1, 127:16, 127:17, 127:25, 128:19, 134:4, 134:9, 135:5, 135:6, 135:7, 135:10,

136:2, 136:3, 136:7, 136:11, 136:15, 136:18, 136:20, 136:25, 137:2, 137:5, 137:7, 137:10, 137:12, 137:19, 137:23, 137:24, 138:2, 138:13, 138:16, 138:18, 138:21, 139:3, 141:5, 141:18, 145:19, 145:20

census-based [1] - 59:13

center [2] - 88:7, 88:12

certain [7] - 19:20, 30:20, 48:8, 74:6, 77:15, 101:2, 103:4

certify [2] - 148:6, 148:21

challenged [1] - 67:16

challenges [1] - 68:5

change [18] - 14:22, 14:23, 15:9, 15:13, 32:3, 35:16, 56:10, 56:18, 57:6, 58:19, 60:14, 60:15, 63:4, 63:8, 105:9, 105:12, 110:10, 110:14

changed [21] - 26:13, 27:17, 28:2, 28:5, 30:20, 30:22, 31:2, 31:23, 32:5, 32:11, 36:17, 37:11, 57:4, 57:19, 78:17, 78:18, 79:3, 80:17, 80:20, 144:7, 144:11

changes [14] - 13:12, 13:25, 14:20, 15:12, 15:17, 17:24, 30:17, 33:2, 37:21, 58:16, 63:8, 106:4, 107:10, 144:13

changing [7] - 15:16, 15:19, 27:23, 28:9, 107:13, 107:17, 110:3

charge [1] - 62:13

check [1] - 99:25

chose [1] - 147:2

CINDY [1] - 1:3

circumference [2] - 77:23, 77:24

circumstance [1] - 126:2

circumstances [2] - 126:15, 130:17

citations [1] - 97:15

cities [2] - 116:5,

116:8

City [2] - 4:12, 148:10

city [25] - 47:25, 48:7, 48:15, 52:17, 53:3, 53:24, 72:9, 73:2, 73:13, 73:16, 73:21, 74:19, 76:10, 76:21, 77:13, 112:15, 113:6, 113:12, 113:19, 133:5, 133:6, 134:1, 137:9, 137:11, 139:1

CLARENCE [1] - 1:5

clarification [1] - 38:18

clarify [2] - 30:11, 87:18

clarifying [1] - 38:22

cleansed [3] - 13:17, 18:1, 19:20

clear [1] - 37:7

clearly [1] - 52:19

CLEEREMAN [1] - 1:4

clerk [16] - 25:10, 26:6, 46:15, 46:16, 60:13, 73:5, 74:21, 74:25, 75:8, 117:11, 119:1, 119:4, 119:14, 132:4, 133:25, 144:24

clerk's [1] - 74:18

clerks [50] - 11:12, 20:5, 20:9, 20:13, 20:21, 20:24, 25:1, 25:24, 26:24, 26:25, 27:1, 27:7, 27:12, 27:19, 28:6, 31:3, 31:5, 31:18, 31:22, 33:3, 33:23, 42:18, 45:7, 53:15, 53:19, 56:1, 56:4, 56:6, 57:10, 57:22, 58:5, 59:2, 61:21, 62:5, 92:22, 92:23, 93:3, 94:15, 96:10, 97:9, 106:12, 107:10, 125:4, 129:1, 129:9, 130:7, 130:10, 141:14, 142:4

Clerks [1] - 55:21

close [1] - 133:1

coast [2] - 88:8, 131:25

COCHRAN [1] - 1:4

combination [2] - 58:15, 138:2

combinations [1] - 137:7

combo [16] - 22:1,

22:5, 22:20, 23:18, 23:22, 23:24, 24:2, 25:3, 26:6, 26:22, 33:12, 58:14, 61:15, 62:21, 132:8, 133:2

combos [5] - 21:24, 22:16, 24:15, 61:17

coming [3] - 28:10, 98:20, 141:17

commanded [2] - 131:5, 131:12

commencing [1] - 4:14

commission [1] - 149:9

commissioned [1] - 148:5

common [1] - 18:11

communicate [1] - 93:17

communicated [6] - 92:15, 92:24, 93:2, 93:6, 93:8, 93:13

communication [2] - 93:7, 96:21

communications [13] - 89:5, 89:20, 91:6, 91:16, 92:23, 94:9, 94:14, 95:4, 95:20, 98:8, 98:13, 98:14

comparative [1] - 32:23

compare [3] - 50:2, 105:22, 124:5

compared [5] - 40:24, 81:13, 81:16, 122:11, 143:23

comparing [9] - 77:23, 102:19, 102:24, 103:3, 103:7, 128:1, 128:7, 128:9, 143:6

comparison [8] - 36:17, 46:19, 50:5, 70:1, 71:2, 122:14, 123:18, 147:4

comparisons [1] - 71:1

complete [5] - 28:10, 28:11, 34:24, 101:15, 136:2

completed [8] - 27:4, 28:17, 28:19, 29:1, 29:6, 29:11, 29:13, 34:8

completely [1] - 35:1

completion [1] - 35:14

comprehensive [3] -

95:5, 121:11, 121:17

computer [4] - 82:21, 136:6, 140:6, 148:18

computer-aided [1] - 148:18

concentrate [1] - 132:13

concern [1] - 6:11

concerned [1] - 16:14

concerning [1] - 148:14

concerns [1] - 40:10

concluded [1] - 78:15

conclusion [6] - 78:21, 78:22, 78:24, 81:24, 82:12, 97:25

conclusions [1] - 96:14

conduct [3] - 49:14, 53:6, 79:19

conducted [13] - 65:11, 69:24, 79:13, 79:16, 83:21, 85:11, 85:12, 91:15, 121:10, 121:18, 143:5, 144:12, 145:9

conducting [1] - 77:22

confirm [2] - 80:16, 80:19

conflict [4] - 40:18, 71:21, 97:5, 97:13

conflicting [1] - 40:11

conform [1] - 55:9

confusion [1] - 62:4

conglomerating [1] - 100:19

congressional [48] - 10:21, 16:7, 16:23, 21:17, 22:9, 24:8, 36:9, 36:16, 37:8, 37:13, 37:14, 47:3, 52:12, 54:10, 54:12, 54:16, 55:13, 60:10, 60:24, 63:5, 71:24, 75:3, 78:1, 78:18, 80:20, 81:17, 82:9, 82:17, 83:23, 84:2, 84:4, 91:5, 91:8, 94:12, 94:21, 94:24, 101:18, 101:20, 109:17, 109:22, 110:4, 110:6, 110:10, 110:14, 138:13, 138:18, 144:3, 146:5

conjunction [1] -

46:16

considering [1] - 27:20

consist [1] - 8:10

consistency [2] - 80:9, 80:11

consistent [1] - 52:6

contacted [1] - 46:17

contain [3] - 84:19, 84:25, 130:6

contained [3] - 67:3, 84:8, 132:15

containing [1] - 73:15

contains [4] - 44:1, 68:15, 68:20, 133:15

context [3] - 68:6, 68:25, 87:19

contingency [1] - 29:5

continue [1] - 28:5

Continued [2] - 1:17, 5:1

continues [2] - 45:19, 118:13

continuing [1] - 8:19

controversy [1] - 148:15

conversion [1] - 57:3

coordinate [1] - 12:16

coordinated [1] - 66:6

coordinates [4] - 11:24, 20:3, 20:25, 30:16

copies [2] - 3:18, 56:15

Copies [1] - 3:19

copy [5] - 8:1, 8:7, 38:4, 38:7, 72:16

core [1] - 21:14

correct [238] - 9:17, 10:14, 10:17, 10:18, 10:23, 12:12, 12:13, 13:5, 14:2, 14:18, 15:6, 16:1, 16:4, 18:2, 18:3, 18:12, 18:15, 19:12, 19:17, 20:11, 20:22, 22:21, 23:7, 23:21, 24:6, 24:9, 24:18, 24:20, 25:4, 25:7, 25:14, 26:9, 26:10, 26:25, 27:1, 27:3, 27:23, 28:23, 28:25, 30:3, 30:6, 30:7, 31:1, 31:4, 31:5, 31:14, 32:13, 32:21, 32:25, 33:1, 33:6, 35:6, 35:10, 36:4,

36:25, 40:17, 41:3, 41:22, 41:23, 42:2, 42:3, 42:6, 42:7, 42:22, 43:12, 43:13, 43:23, 43:24, 44:18, 44:19, 45:4, 49:17, 49:18, 49:21, 52:16, 52:21, 53:1, 53:10, 53:13, 53:14, 53:17, 53:21, 54:5, 54:18, 55:4, 55:24, 56:12, 56:19, 56:22, 57:1, 58:4, 58:5, 58:9, 58:22, 59:8, 59:16, 59:22, 60:16, 61:8, 61:22, 62:3, 62:14, 63:1, 63:6, 63:7, 64:22, 65:18, 68:2, 69:1, 69:5, 69:8, 69:10, 70:8, 70:19, 70:20, 71:17, 72:10, 72:11, 72:13, 73:9, 74:12, 74:13, 74:15, 74:20, 74:22, 79:17, 79:19, 80:1, 80:23, 80:24, 81:22, 81:23, 82:3, 82:4, 82:5, 82:11, 82:14, 82:15, 82:18, 82:19, 83:19, 83:25, 84:6, 88:11, 88:16, 89:14, 89:15, 91:24, 92:5, 93:15, 93:16, 93:25, 96:5, 96:10, 96:17, 96:18, 99:23, 99:24, 100:4, 100:9, 100:11, 100:15, 100:18, 101:8, 101:13, 103:15, 105:24, 106:22, 107:15, 107:25, 109:1, 109:6, 110:18, 111:25, 112:8, 112:12, 113:16, 116:7, 117:2, 117:17, 117:20, 118:16, 119:23, 120:1, 120:4, 120:10, 120:20, 123:6, 124:24, 124:25, 125:4, 128:4, 128:14, 128:15, 128:22, 129:20, 130:8, 130:15, 130:16, 130:20, 130:25, 132:5, 133:4, 134:14, 135:5, 135:12, 136:3, 137:8, 138:5, 138:8, 138:22, 140:3, 140:4, 140:13, 140:20, 140:22, 141:14, 141:15, 141:19,

141:20, 141:22, 142:1, 142:5, 142:6, 142:8, 142:9, 142:13, 143:2, 143:13, 143:21, 144:9, 144:15, 144:25, 145:6, 145:7, 145:13, 145:15, 145:16

corrected [62] - 31:3, 31:4, 31:15, 31:17, 31:19, 32:11, 32:17, 32:20, 33:5, 33:8, 34:5, 34:21, 34:22, 35:20, 37:11, 37:14, 47:8, 47:10, 47:21, 53:20, 54:2, 54:3, 54:14, 54:16, 54:25, 55:1, 55:10, 57:10, 57:19, 58:2, 59:10, 59:12, 60:7, 61:2, 61:4, 61:18, 62:6, 62:15, 62:19, 71:3, 71:10, 71:13, 71:15, 75:13, 88:8, 88:9, 110:24, 111:1, 114:6, 114:9, 114:11, 114:19, 115:3, 115:22, 120:17, 126:22, 126:25, 127:15, 132:11, 141:4, 142:24, 143:19

correcting [5] - 46:6, 55:8, 58:5, 75:10, 110:21

correction [7] - 31:9, 31:12, 36:6, 38:23, 75:2, 105:24

corrections [17] - 53:16, 56:14, 58:18, 61:10, 71:20, 75:7, 75:9, 91:23, 96:9, 97:10, 97:12, 97:18, 97:21, 106:6, 106:7, 106:10, 129:16

corrective [1] - 98:4

correctly [6] - 25:25, 29:14, 34:10, 38:24, 80:13, 109:2

corrects [1] - 60:7

Counsel [2] - 2:1, 2:16

counsel [9] - 3:18, 3:19, 6:23, 7:3, 7:5, 98:9, 148:22, 148:25

count [1] - 113:12

counterpart [1] - 39:10

counties [60] - 27:8, 31:25, 42:24, 48:11, 49:7, 49:12, 49:15,

49:23, 49:24, 49:25, 50:10, 50:12, 50:13, 50:18, 50:20, 50:21, 50:23, 50:25, 51:2, 51:3, 58:21, 59:11, 59:19, 59:21, 59:23, 59:25, 60:1, 60:19, 65:12, 66:5, 66:11, 66:17, 66:21, 69:2, 69:9, 77:23, 80:3, 80:23, 81:8, 81:15, 85:13, 85:15, 85:21, 86:11, 86:15, 87:8, 90:6, 92:9, 96:16, 108:15, 109:15, 109:24, 121:11, 141:13, 142:4, 146:3, 146:13, 146:24

countries [1] - 87:25
county [106] - 11:12, 19:19, 19:21, 20:2, 20:5, 20:8, 20:13, 20:20, 21:18, 26:24, 27:12, 27:18, 28:6, 31:3, 31:5, 31:18, 31:22, 33:3, 42:21, 45:7, 46:16, 49:25, 50:1, 50:15, 58:17, 60:8, 60:13, 60:20, 60:25, 61:3, 61:9, 61:20, 62:21, 63:7, 65:16, 66:8, 66:15, 68:21, 69:4, 70:1, 73:5, 73:6, 76:22, 77:25, 81:11, 81:13, 83:3, 84:5, 84:13, 85:8, 85:16, 86:1, 86:3, 86:16, 86:18, 86:19, 86:20, 86:23, 86:25, 87:1, 87:2, 87:10, 92:21, 92:23, 93:3, 96:10, 106:12, 108:16, 108:17, 109:8, 114:18, 117:22, 122:11, 122:13, 123:15, 123:18, 125:3, 125:24, 127:4, 127:10, 127:11, 128:11, 129:13, 129:18, 133:7, 133:8, 133:10, 133:15, 137:16, 137:17, 138:1, 138:3, 138:7, 141:8, 141:12, 141:13, 141:17, 143:6, 144:5, 146:1, 146:19, 146:20, 146:25

COUNTY [1] - 148:2
County [33] - 4:12,

46:8, 46:15, 47:18, 47:20, 70:11, 70:22, 70:25, 71:2, 71:6, 71:16, 71:19, 73:8, 74:18, 74:21, 74:24, 75:8, 75:10, 76:17, 76:22, 76:23, 77:2, 85:22, 87:7, 112:13, 133:25, 137:25, 146:18, 146:19, 146:20, 148:10

county-based [14] - 19:19, 49:25, 50:1, 58:17, 70:1, 81:11, 83:3, 108:16, 122:11, 123:18, 127:10, 129:13, 129:18, 141:13

couple [6] - 6:19, 11:8, 22:23, 38:2, 67:9, 98:22

Court [1] - 4:6
court [4] - 6:25, 8:8, 72:21, 74:1
COURT [1] - 1:1
create [11] - 21:23, 22:20, 38:21, 39:1, 43:1, 43:6, 76:25, 101:1, 101:16, 111:20, 140:5
created [20] - 17:17, 28:19, 55:9, 56:1, 56:16, 57:9, 76:7, 76:15, 76:20, 76:21, 77:1, 84:18, 84:24, 89:23, 89:24, 90:1, 91:21, 97:4, 97:24, 133:9
creates [3] - 48:5, 77:11, 113:5
creating [3] - 10:22, 38:14, 38:16
creation [1] - 10:19
critical [1] - 62:1
crosscheck [1] - 80:8
Crosse [6] - 75:18, 76:12, 76:22, 77:2, 146:19
current [1] - 20:14
cursor [1] - 136:14

D

daily [1] - 56:18
Dan [2] - 76:5, 122:7
Dane [6] - 4:12, 76:22, 77:2, 137:25, 146:19, 148:11

DANE [1] - 148:2
DANIEL [1] - 5:9
data [86] - 11:22, 12:2, 12:23, 13:4, 17:2, 17:20, 17:21, 17:23, 19:9, 20:8, 20:9, 30:4, 30:10, 31:4, 31:15, 31:17, 41:22, 41:24, 42:5, 42:6, 43:11, 43:19, 44:11, 44:22, 44:25, 45:3, 45:14, 45:18, 46:11, 46:24, 50:2, 50:3, 50:10, 50:12, 50:22, 50:25, 63:8, 66:12, 66:15, 66:18, 66:19, 69:4, 70:1, 70:2, 70:16, 73:14, 74:10, 74:19, 79:18, 79:20, 83:1, 89:5, 89:20, 91:11, 95:4, 95:12, 95:15, 95:17, 95:18, 99:4, 99:5, 99:7, 102:4, 102:18, 106:13, 108:16, 108:19, 118:11, 119:13, 119:15, 127:11, 127:12, 135:6, 137:18, 137:19, 141:13, 141:16, 142:24, 143:13, 143:19, 144:5, 144:6, 145:19
database [13] - 18:7, 19:8, 19:10, 19:15, 20:15, 23:8, 23:11, 23:12, 23:13, 47:13, 48:21, 48:25, 75:9
databases [1] - 95:13
date [5] - 16:18, 28:14, 51:14, 57:25, 58:6
dated [1] - 46:4
DAVID [7] - 1:15, 1:19, 2:14, 3:3, 4:1, 5:19, 148:12
David [3] - 6:1, 14:13, 14:14
DAVIS [1] - 1:5
DC1s [1] - 26:21
De [1] - 4:24
DE [1] - 2:8
deadline [1] - 51:3
dealing [1] - 42:5
December [16] - 27:25, 28:2, 30:19, 30:25, 31:23, 32:15, 32:19, 32:25, 57:22, 57:24, 58:1, 79:8,

79:10, 79:24, 81:1, 140:21

decided [3] - 115:11, 120:7, 125:11

decimal [1] - 12:20

decimal-based [1] - 12:20

decision [6] - 27:3, 31:9, 45:8, 56:13, 79:21, 125:12

decisions [2] - 106:13, 126:1

deemed [2] - 45:3, 45:6

deeper [1] - 37:6

default [2] - 88:6, 88:17

defendants [2] - 7:6, 93:14

Defendants [7] - 2:3, 2:6, 2:17, 4:5, 5:7, 5:11, 5:14

define [1] - 138:12

defined [5] - 15:14, 54:8, 102:14, 103:11, 103:12

defines [1] - 138:16

definition [1] - 108:19

DEININGER [2] - 1:15, 2:14

demographic [1] - 42:10

DEPARTMENT [1] - 5:6

depict [1] - 76:17

depicted [2] - 74:7, 74:8

depicting [1] - 83:6

deposition [17] - 3:12, 3:24, 6:17, 7:15, 8:2, 8:4, 8:9, 8:12, 8:13, 8:17, 8:20, 38:3, 38:6, 88:25, 93:15, 148:18, 148:24

DEPOSITION [2] - 1:18, 4:1

depositions [2] - 7:17, 38:4

describe [6] - 11:8, 39:21, 44:9, 44:21, 60:17, 73:25

described [3] - 19:11, 72:25, 137:2

describing [3] - 60:12, 94:8, 111:18

Description [1] - 3:11

design [4] - 14:4, 14:20, 14:21

designated [1] - 9:2

designed [5] - 13:12, 13:25, 14:21, 15:17, 17:24

detail [1] - 104:24

detailed [1] - 83:1

details [1] - 79:5

determination [5] - 10:20, 20:1, 47:19, 79:25, 124:22

determinations [1] - 84:20

determine [16] - 10:10, 36:6, 36:10, 36:12, 49:22, 56:9, 79:15, 83:21, 84:10, 89:16, 102:8, 107:4, 108:3, 108:6, 136:6, 139:2

determined [5] - 37:19, 37:23, 108:5, 143:13, 146:2

determining [9] - 32:16, 33:7, 47:12, 48:20, 48:24, 108:21, 119:5, 119:19, 139:9

DEUREN [1] - 5:9

develop [1] - 10:1

developed [1] - 121:21

developing [2] - 59:2, 119:21

deviate [1] - 114:9

deviating [2] - 115:4, 115:23

differ [2] - 113:13, 113:15

differed [1] - 122:17

difference [3] - 65:13, 104:2, 143:9

differences [5] - 44:16, 83:2, 102:12, 106:3, 145:1

different [34] - 7:17, 8:22, 17:10, 22:20, 22:24, 25:18, 25:23, 30:10, 32:4, 33:11, 36:25, 37:4, 38:6, 41:14, 44:18, 45:1, 54:4, 54:17, 55:2, 66:17, 67:13, 87:25, 95:20, 95:25, 104:3, 123:22, 125:19, 131:20, 139:23, 143:1, 143:11, 143:20, 144:4

direction [1] - 66:6

directly [3] - 31:12, 40:2, 71:21

Director [2] - 2:1,

2:15

discrepancies [15] - 76:9, 76:14, 89:13, 90:23, 92:16, 92:25, 93:4, 93:9, 93:20, 94:3, 122:16, 144:9, 144:15, 144:21, 145:12

Discrepancy [1] - 3:13

discrepancy [8] - 72:25, 76:25, 103:14, 103:16, 124:8, 124:12, 124:14, 124:19

discuss [3] - 78:24, 79:6, 96:13

discussed [2] - 40:19, 41:2

discussing [1] - 55:1

discussion [1] - 90:5

discussions [5] - 90:18, 90:21, 94:18, 97:20, 98:3

distance [1] - 132:25

District [2] - 4:6

DISTRICT [2] - 1:1, 1:1

district [159] - 11:15, 15:16, 15:20, 15:21, 15:24, 16:2, 16:6, 16:7, 16:16, 16:20, 17:16, 21:20, 21:21, 21:22, 21:24, 22:3, 22:5, 22:20, 23:18, 23:22, 23:24, 23:25, 24:2, 24:4, 24:8, 24:14, 24:15, 25:2, 25:3, 25:14, 26:6, 26:10, 26:12, 26:22, 31:20, 32:4, 32:5, 32:10, 32:13, 32:21, 33:11, 33:25, 34:1, 35:16, 35:19, 36:7, 36:8, 36:9, 36:24, 36:25, 37:1, 37:13, 37:14, 43:6, 44:3, 45:22, 47:2, 47:3, 47:9, 50:15, 52:3, 52:7, 52:11, 52:12, 52:19, 54:10, 54:23, 54:24, 55:1, 55:2, 55:3, 55:14, 55:23, 58:14, 58:16, 59:4, 60:15, 60:24, 60:25, 61:1, 61:15, 61:17, 62:20, 62:21, 67:13, 67:14, 68:16, 70:12, 82:2, 82:14, 82:17, 83:12, 83:17, 83:23,

84:2, 84:4, 85:7, 85:8, 85:9, 86:21, 87:2, 87:11, 91:23, 95:25, 96:9, 101:20, 107:10, 107:13, 107:17, 108:6, 108:10, 108:21, 108:23, 109:3, 110:4, 110:7, 110:11, 110:15, 121:12, 121:13, 123:9, 123:11, 123:17, 123:20, 123:22, 124:6, 124:24, 125:10, 125:17, 125:19, 126:4, 126:5, 126:16, 126:19, 129:11, 130:20, 131:11, 132:8, 132:13, 132:19, 133:2, 134:24, 138:18, 142:23, 143:1, 143:8, 143:18, 143:21, 143:25, 144:3, 145:2, 145:21

district-based [2] - 50:15, 62:20

districted [3] - 25:25, 29:13, 34:10

Districts [1] - 97:4

districts [100] - 10:21, 12:7, 12:9, 13:13, 14:1, 14:24, 15:14, 15:18, 21:16, 21:18, 21:19, 22:1, 22:2, 22:6, 22:9, 22:10, 22:14, 23:10, 25:7, 26:14, 30:10, 30:14, 30:20, 32:18, 32:20, 32:24, 33:4, 33:8, 33:17, 34:5, 34:22, 36:16, 37:4, 37:8, 37:22, 43:1, 47:21, 51:21, 53:16, 53:20, 54:3, 54:4, 54:13, 54:16, 55:10, 56:23, 60:6, 60:10, 60:22, 61:12, 62:3, 62:7, 62:15, 71:24, 75:4, 78:2, 78:17, 78:18, 79:4, 80:17, 80:20, 81:17, 82:9, 82:10, 84:10, 84:25, 91:5, 91:8, 94:12, 94:21, 94:24, 97:10, 101:18, 108:11, 109:17, 109:22, 110:24, 111:1, 111:7, 114:11, 114:19, 121:13, 121:14, 121:15, 126:22,

126:25, 127:15, 127:25, 129:10, 130:15, 130:25, 131:5, 138:13, 139:3, 139:9, 141:4, 142:19, 146:5

document [11] - 8:8, 38:5, 38:9, 39:20, 56:24, 63:11, 64:17, 72:16, 72:20, 78:11, 82:23

documentation [1] - 45:13

documents [5] - 38:2, 89:4, 89:20, 91:11, 95:4

DOJ [1] - 98:10

domicile [1] - 12:6

Done [1] - 98:23

done [42] - 6:21, 10:5, 15:1, 15:7, 18:17, 19:18, 24:22, 28:15, 29:15, 29:16, 29:19, 29:24, 32:2, 34:18, 34:23, 35:1, 36:11, 47:17, 50:19, 53:3, 58:12, 70:21, 70:23, 71:4, 80:13, 80:15, 80:18, 80:19, 80:21, 87:5, 90:6, 98:25, 101:15, 105:5, 105:7, 126:13, 129:2, 134:15, 134:16, 140:3, 145:22

dot [1] - 17:4

Doty [3] - 4:11, 5:3, 148:9

Douglas [1] - 3:25

DOUGLAS [1] - 4:19

down [13] - 7:1, 36:5, 41:7, 55:15, 57:20, 60:4, 65:22, 68:12, 74:3, 77:21, 110:22, 120:18, 126:21

downloaded [1] - 16:25

DPW [1] - 2:12

draft [1] - 38:19

draw [4] - 51:17, 66:1, 97:7, 117:12

drawn [10] - 40:24, 44:25, 45:2, 110:7, 111:5, 111:12, 118:21, 124:6, 128:9, 128:10

drew [1] - 117:19

du [1] - 146:20

due [1] - 34:1

Due [1] - 118:10

DUFFY [1] - 2:5

(608) 833-0392

duly [3] - 5:20, 148:4, 148:12
during [2] - 67:15, 123:17
duties [1] - 6:6

E

e-mail [1] - 96:21
E911 [1] - 19:23
earth [2] - 88:7, 88:12
East [5] - 4:11, 4:20, 5:3, 5:13, 148:9
Eastern [1] - 4:6
EASTERN [1] - 1:1
easy [1] - 125:18
ECKSTEIN [1] - 1:5
effects [2] - 94:10, 94:22
effort [3] - 107:3, 118:1, 141:21
efforts [4] - 6:10, 6:16, 39:17
eight [1] - 85:15
either [2] - 87:12, 98:3
election [14] - 11:6, 11:15, 11:16, 11:17, 21:15, 28:11, 28:16, 28:18, 29:14, 34:9, 39:11, 53:13, 62:4, 144:1
elections [23] - 11:12, 28:10, 28:23, 29:2, 29:7, 29:11, 29:20, 29:21, 35:3, 35:4, 35:9, 51:12, 59:5, 59:6, 59:7, 67:16, 67:25, 68:6, 68:10, 90:7, 90:8, 106:5, 143:25
ELVIRA [1] - 1:4
employed [2] - 148:22, 149:1
employee [1] - 148:25
end [7] - 31:9, 49:5, 68:12, 68:13, 81:1, 141:2
ended [1] - 86:10
enforcement [1] - 53:9
engaged [1] - 118:1
engaging [1] - 107:3
engine [1] - 18:22
ensure [10] - 23:5, 25:13, 25:24, 34:9, 38:23, 59:15, 66:19,

80:7, 80:12, 107:25
ensuring [4] - 25:2, 25:4, 25:6, 88:10
entail [1] - 18:4
entire [3] - 112:17, 114:8, 142:11
entirely [2] - 105:4, 112:18
entitled [4] - 30:2, 30:4, 30:5, 55:15
equal [1] - 99:20
ERICA [1] - 2:9
error [4] - 45:20, 104:9, 122:25, 123:1
errors [2] - 102:1, 134:13
essentially [1] - 101:3
established [1] - 96:1
estimate [3] - 28:8, 34:25, 35:22
estimates [3] - 91:2, 94:1, 94:18
et [4] - 4:3, 4:5, 4:21, 4:24
evaluate [1] - 57:5
evaluated [1] - 75:12
evaluating [1] - 26:8
EVANJELINA [1] - 1:4
eventually [1] - 117:12
evidence [1] - 118:19
exactly [9] - 22:13, 100:10, 111:7, 116:15, 116:23, 117:13, 124:4, 127:12, 128:18
Examination [3] - 3:4, 3:5, 3:6
EXAMINATION [4] - 5:23, 99:1, 139:15, 146:11
examination [1] - 148:17
examined [1] - 148:16
example [15] - 22:3, 24:5, 36:21, 40:20, 52:18, 53:4, 71:20, 76:17, 83:10, 90:20, 96:7, 104:1, 104:25, 131:24, 133:24
examples [5] - 76:18, 76:21, 83:6, 83:7, 126:6
excel [1] - 57:7
Excel [1] - 83:5

exception [38] - 25:9, 26:1, 26:4, 26:12, 26:16, 26:17, 26:18, 34:16, 35:25, 40:17, 55:21, 56:1, 56:7, 56:15, 56:21, 57:9, 57:13, 57:18, 88:3, 102:9, 104:20, 116:18, 116:19, 130:2, 130:6, 130:7, 130:19, 130:24, 131:11, 131:18, 131:21, 132:1, 132:14, 132:20, 133:14, 134:12
exceptions [48] - 25:8, 25:15, 25:18, 25:20, 25:22, 25:23, 26:4, 26:11, 26:23, 27:2, 27:9, 27:14, 27:20, 27:23, 29:18, 31:6, 34:12, 34:20, 34:24, 35:2, 36:22, 40:15, 40:21, 45:25, 56:4, 56:19, 57:12, 57:15, 67:11, 68:9, 75:13, 102:3, 103:5, 103:21, 104:5, 104:7, 104:14, 104:16, 104:18, 130:11, 130:14, 131:23, 132:2, 132:7, 133:10, 144:23
exclude [1] - 92:21
exclusively [2] - 68:16, 70:12
exhibit [2] - 38:8, 38:13
Exhibit [56] - 3:14, 3:15, 3:18, 3:19, 8:5, 8:9, 8:23, 38:5, 38:12, 38:15, 38:16, 38:19, 38:21, 39:1, 39:24, 40:20, 42:1, 51:17, 63:12, 63:17, 64:17, 65:4, 70:6, 72:18, 72:21, 72:24, 73:4, 73:5, 73:7, 73:11, 73:19, 74:7, 76:11, 77:9, 86:12, 88:24, 97:1, 98:12, 110:19, 114:3, 118:7, 120:16, 121:4, 133:22, 135:4, 135:14, 135:18, 135:25, 136:13, 138:19, 138:23, 138:24, 139:17, 139:20, 140:23, 142:15
exhibits [3] - 38:3,

75:15, 98:11
exist [4] - 16:11, 127:4, 141:7, 141:12
existed [1] - 137:25
existence [2] - 89:17, 140:9
exists [3] - 13:3, 91:12, 96:19
expect [5] - 50:17, 50:20, 69:3, 85:16, 86:19
expectation [13] - 50:24, 58:23, 92:6, 119:24, 124:17, 124:18, 124:19, 125:3, 130:13, 130:22, 131:2, 131:3, 131:8
expectations [1] - 89:12
expects [1] - 28:15
expert [3] - 29:12, 79:21, 136:18
expires [1] - 149:9
explanation [2] - 103:24, 122:22
explanations [2] - 103:25, 122:23
explore [2] - 102:1, 102:3
exported [1] - 33:14
extent [3] - 32:2, 39:16, 54:14
externally [1] - 98:3

F

face [1] - 96:1
fact [7] - 31:23, 52:14, 74:18, 79:16, 80:1, 93:7, 96:7
fair [3] - 28:24, 76:5, 136:25
faith [3] - 107:3, 118:1, 124:22
Falk [2] - 39:2, 90:16
familiar [5] - 51:24, 64:15, 78:4, 78:6, 78:21
far [10] - 15:5, 33:11, 34:19, 59:11, 82:7, 91:15, 101:12, 104:19, 125:5, 131:10
features [1] - 18:24
February [8] - 28:16, 28:17, 29:20, 35:4, 35:5, 35:9, 51:6, 90:6
federal [2] - 105:5, 105:8

feedback [2] - 61:9, 79:22
feeds [1] - 39:8
feet [8] - 45:16, 73:14, 99:9, 99:12, 99:14, 99:20, 100:2
few [4] - 48:4, 50:7, 63:15, 139:13
field [31] - 99:20, 100:1, 100:3, 100:7, 100:17, 104:1, 104:9, 104:20, 104:25, 105:15, 106:18, 107:4, 111:11, 115:5, 116:20, 116:21, 116:23, 116:24, 117:5, 117:14, 117:20, 118:2, 118:15, 118:20, 119:8, 120:14, 122:18, 124:4, 127:18, 128:13, 128:19
figure [2] - 107:20, 136:15
File [1] - 1:12
file [6] - 33:15, 41:11, 41:12, 41:21, 100:5, 138:3
filed [1] - 3:24
files [19] - 17:5, 17:7, 41:9, 41:25, 42:10, 43:14, 43:15, 43:16, 61:7, 61:14, 84:16, 105:25, 117:22, 117:24, 122:12, 122:13, 129:13, 129:18
fill [2] - 12:4, 56:6
final [4] - 89:6, 89:13, 89:19, 90:23
financially [1] - 149:1
fine [2] - 119:3, 133:19
finished [1] - 14:21
Finley [2] - 1:21, 4:8
FINLEY [1] - 148:3
first [34] - 5:20, 8:1, 8:9, 9:12, 9:14, 11:1, 15:1, 27:24, 28:22, 30:25, 31:23, 32:18, 32:25, 38:11, 38:13, 39:24, 39:25, 40:6, 41:7, 43:19, 51:18, 51:19, 57:23, 63:21, 66:4, 67:9, 79:9, 89:4, 110:20, 110:22, 126:20, 129:21, 145:18

five [6] - 84:11, 84:22, 86:5, 121:7, 121:19, 133:17
five-minute [1] - 86:5
flag [3] - 26:21, 131:23, 132:7
flashbacks [1] - 138:25
flow [1] - 62:5
focus [3] - 16:5, 43:3, 44:7
FOLEY [1] - 5:13
follow [9] - 109:15, 111:2, 115:13, 126:1, 126:23, 127:1, 127:2, 141:4, 141:6
followed [3] - 111:7, 121:6, 127:15
following [11] - 106:14, 106:24, 107:1, 109:4, 109:7, 113:4, 127:25, 128:25, 130:25, 131:3, 148:11
follows [1] - 5:21
Fond [1] - 146:20
football [31] - 99:20, 100:1, 100:3, 100:7, 100:17, 104:1, 104:9, 104:20, 104:25, 105:14, 106:18, 107:4, 111:11, 115:5, 116:19, 116:21, 116:22, 116:24, 117:4, 117:14, 117:20, 118:2, 118:15, 118:20, 119:7, 120:14, 122:18, 124:3, 127:18, 128:13, 128:19
forenoon [2] - 4:14, 148:8
form [71] - 32:7, 37:17, 44:12, 45:5, 47:4, 48:17, 49:3, 53:22, 54:6, 54:19, 55:5, 55:11, 69:20, 74:16, 75:5, 75:20, 83:13, 83:18, 83:24, 85:3, 96:20, 99:16, 99:22, 100:8, 100:22, 101:5, 101:14, 101:23, 102:20, 102:25, 103:23, 104:10, 104:21, 105:18, 106:8, 106:19, 107:6, 108:8, 108:24, 109:11, 111:16, 115:7,

115:19, 116:25, 117:8, 117:16, 117:21, 118:5, 118:22, 119:11, 122:9, 122:21, 124:1, 124:10, 125:1, 125:7, 125:21, 127:20, 128:2, 128:8, 128:16, 128:21, 131:6, 131:13, 131:17, 143:3, 143:14, 143:22, 144:10, 145:23, 146:6
format [13] - 12:21, 13:19, 16:21, 17:2, 17:8, 17:9, 17:11, 18:2, 18:11, 23:6, 57:7, 61:8, 83:5
formats [1] - 57:4
formatting [1] - 18:10
foundation [31] - 101:10, 101:24, 102:21, 103:1, 103:6, 103:18, 106:9, 107:7, 108:9, 109:12, 111:15, 115:8, 115:20, 117:9, 118:4, 118:23, 119:10, 119:11, 122:10, 125:2, 125:22, 126:11, 127:21, 128:3, 128:8, 128:17, 129:17, 129:23, 131:7, 131:14, 131:17
frame [2] - 18:17, 81:2
free [1] - 135:21
Friday [1] - 51:9
front [6] - 38:8, 72:22, 75:23, 91:17, 139:17, 139:20
FRONTERA [1] - 2:8
Frontera [1] - 4:24
FTP [1] - 21:9
full [7] - 43:18, 51:18, 55:19, 67:9, 70:10, 71:19, 97:7
function [1] - 39:14
functional [1] - 39:7
future [1] - 106:3

G

GAB [81] - 9:8, 14:5, 14:7, 14:10, 14:11, 14:14, 20:12, 20:23, 25:17, 28:15, 28:21, 29:5, 31:8, 31:16, 34:4, 39:6, 40:3, 45:4,

46:14, 49:10, 49:22, 51:3, 51:4, 52:8, 52:13, 55:7, 55:16, 56:15, 57:8, 58:9, 58:20, 58:24, 60:1, 61:20, 65:9, 67:18, 68:1, 68:3, 68:8, 72:7, 90:19, 90:21, 91:6, 92:15, 92:24, 93:3, 93:18, 93:22, 93:23, 94:9, 94:15, 95:11, 95:16, 97:9, 97:20, 98:2, 103:17, 105:8, 105:25, 106:23, 106:25, 107:2, 109:7, 109:20, 110:2, 110:3, 110:5, 117:25, 118:8, 120:2, 120:5, 120:9, 121:10, 126:3, 126:8, 129:24, 135:20, 141:14, 141:16, 142:7, 142:10
GAB's [15] - 66:6, 89:5, 89:8, 93:10, 97:24, 98:9, 101:17, 109:3, 109:14, 119:24, 124:17, 125:20, 125:23, 130:22, 131:3
general [7] - 22:25, 34:6, 89:19, 136:19, 136:21, 137:22, 144:17
General [3] - 2:1, 2:16, 5:6
generally [12] - 17:9, 44:20, 44:21, 44:24, 54:1, 54:2, 65:2, 69:21, 69:22, 91:13, 91:14, 136:21
generate [4] - 24:14, 33:15, 42:21, 139:22
generated [15] - 20:19, 21:2, 33:14, 41:12, 41:21, 42:1, 43:11, 82:21, 82:23, 83:4, 84:8, 84:17, 92:4, 140:15, 140:16
generates [1] - 41:13
generating [2] - 42:19, 95:19
geocode [18] - 15:12, 21:5, 25:5, 25:9, 25:13, 26:1, 26:2, 31:5, 88:2, 88:5, 88:11, 107:24, 131:23, 131:24, 132:1, 132:9, 145:8
geocoded [6] - 25:5, 25:7, 26:19, 30:9,

81:14
geocoders [1] - 88:17
geocodes [2] - 34:2, 88:6
geocoding [7] - 12:20, 12:22, 13:20, 18:14, 18:18, 18:20, 19:3
geographic [1] - 76:19
geography [5] - 43:23, 127:3, 136:7, 141:6, 141:11
geolocating [2] - 87:16, 87:24
geolocation [3] - 11:23, 20:19, 95:24
geolocational [3] - 12:14, 19:9, 20:16
GERALD [2] - 1:15, 2:14
gestures [1] - 74:3
GIS [74] - 11:24, 12:15, 14:25, 17:4, 17:10, 19:19, 19:21, 20:3, 20:6, 31:19, 41:15, 45:2, 46:16, 50:1, 50:16, 50:21, 50:22, 58:18, 60:20, 61:3, 61:9, 62:21, 63:7, 65:16, 66:8, 66:15, 66:18, 68:15, 68:20, 68:21, 69:4, 70:1, 70:2, 70:12, 71:2, 72:15, 73:6, 81:13, 84:5, 84:13, 85:8, 85:16, 85:17, 86:20, 87:2, 87:10, 102:12, 102:13, 102:16, 103:13, 105:23, 106:2, 108:16, 108:17, 114:18, 117:22, 117:24, 119:15, 119:18, 119:22, 122:13, 123:15, 123:18, 127:10, 127:12, 128:11, 129:13, 129:18, 133:25, 141:13, 143:7, 144:5, 146:25, 147:1
GIS-based [3] - 14:25, 41:15, 50:21
given [22] - 6:16, 8:7, 9:25, 10:3, 38:7, 51:2, 51:3, 52:19, 55:21, 79:18, 99:12, 106:14, 108:13, 110:7,

115:11, 118:21, 119:17, 127:13, 136:7, 136:25, 137:12, 148:19
GLADYS [1] - 1:6
global [1] - 17:12
GLORIA [1] - 1:7
go-around [1] - 15:10
goal [2] - 34:8, 62:6
GODFREY [1] - 4:19
golly [1] - 116:14
good-faith [3] - 107:3, 118:1, 124:22
Google [6] - 17:13, 17:14, 135:1, 135:4, 135:13, 136:11
Government [8] - 1:13, 2:2, 2:12, 2:16, 4:4, 6:3, 8:21, 9:1
government [3] - 40:3, 105:5, 105:8
graphic [3] - 72:12, 72:24, 75:16
graphical [6] - 41:19, 76:3, 76:8, 76:11, 76:13, 77:1
Grassel [1] - 14:13
great [1] - 119:2
greater [1] - 105:3
ground [4] - 6:20, 117:6, 119:6, 120:8
grounded [1] - 37:25
groups [1] - 19:2
guess [19] - 29:3, 30:23, 33:19, 34:15, 37:6, 39:11, 41:18, 57:12, 65:6, 76:16, 104:4, 104:24, 106:2, 111:20, 114:20, 120:6, 120:13, 144:18
guideline [1] - 80:4
GWENDOLYNNE [1] - 1:10

H

half [2] - 112:19, 112:20
halfway [1] - 112:6
hand [6] - 38:4, 63:11, 72:16, 115:25, 116:3, 149:4
handed [1] - 72:20
handle [2] - 7:18, 145:11
handled [2] - 14:7, 14:9
happy [1] - 7:11

Case 2:11-cv-00562-JPS-DPW-RMD   Filed 02/20/12   Page 47 of 56   Document 172

WWW.FORTHERECORDMAL.CON.COM   (608) 833-0392

kidding [1] - 98:23
KIND [1] - 1:10
kind [28] - 7:21, 12:14, 12:23, 16:21, 17:2, 28:14, 35:22, 58:25, 63:23, 68:8, 76:25, 78:7, 79:25, 80:4, 80:7, 82:20, 82:24, 91:11, 92:11, 97:24, 98:4, 105:15, 116:20, 118:13, 118:15, 126:9, 131:18, 132:21
kinds [3] - 40:20, 96:4, 140:5
knowledge [12] - 15:3, 42:3, 42:16, 43:13, 104:18, 104:23, 111:23, 118:19, 129:22, 129:24, 130:1, 148:14
knows [1] - 103:19
KRESBACH [1] - 1:6

L

LA [1] - 2:8
Lac [1] - 146:20
LANGE [1] - 1:6
language [5] - 22:23, 22:24, 71:22, 72:2, 97:16
LARDNER [1] - 5:13
last [11] - 48:4, 51:9, 58:7, 67:9, 67:10, 67:11, 68:13, 77:10, 98:6
latitude [8] - 13:21, 13:22, 19:4, 19:6, 19:22, 19:24, 30:15, 40:25
law [12] - 106:24, 107:1, 109:5, 109:7, 109:15, 126:1, 126:5, 126:17, 131:1, 131:4, 131:5, 131:12
Law [7] - 4:11, 4:19, 4:22, 5:3, 5:10, 5:13, 148:9
lawful [1] - 4:2
LAWTON [1] - 5:3
Lawton [2] - 4:10, 148:9
lawyers [6] - 92:18, 92:20, 93:8, 93:11, 93:13, 93:17
layer [2] - 135:7, 144:2
layered [2] - 123:20,

139:23
layering [1] - 143:7
layers [1] - 144:2
LAZAR [2] - 5:6, 63:14
lead [6] - 9:21, 14:13, 39:7, 39:13, 39:16, 87:24
learn [1] - 105:14
learned [1] - 71:1
least [5] - 8:10, 33:16, 78:13, 96:15, 100:17
left [5] - 7:1, 10:1, 10:9, 58:21, 99:15
legal [1] - 98:9
legally [1] - 22:13
legislation [2] - 9:16, 98:4
legislative [17] - 10:20, 16:23, 21:17, 22:8, 47:1, 47:9, 47:21, 67:12, 67:17, 78:1, 91:5, 91:8, 94:11, 94:21, 94:24, 110:6, 134:23
Legislative [2] - 42:12, 42:17
legislature [5] - 42:25, 43:4, 43:5, 59:14, 94:5
LESLIE [1] - 1:5
less [1] - 39:10
letter [4] - 7:19, 7:20, 7:23, 8:11
level [6] - 42:21, 79:2, 82:24, 95:19, 125:25, 137:19
likelihood [3] - 48:6, 77:12, 113:5
likely [4] - 78:17, 78:18, 80:17, 112:15
limited [5] - 77:22, 78:9, 79:12, 79:16, 80:16
line [50] - 40:7, 45:22, 58:8, 64:23, 99:12, 99:14, 100:5, 100:6, 105:15, 108:1, 109:3, 111:5, 111:11, 111:13, 111:14, 112:1, 112:3, 112:4, 112:7, 112:12, 115:15, 116:14, 116:20, 117:14, 117:19, 118:2, 118:20, 119:6, 119:8, 119:20, 120:8, 120:14, 120:18, 122:1, 123:7, 123:24,

123:25, 124:4, 124:5, 124:7, 124:8, 124:21, 124:23, 126:21, 127:18, 128:20, 134:5, 134:6, 142:17
lines [31] - 45:20, 58:17, 59:14, 59:15, 62:2, 100:14, 100:16, 103:22, 105:2, 106:17, 107:5, 108:13, 108:23, 110:22, 115:25, 116:13, 117:12, 118:11, 119:17, 121:12, 121:20, 121:23, 121:24, 128:12, 129:14, 134:2, 134:3, 134:4, 136:2, 136:3
list [11] - 20:12, 20:14, 20:23, 21:2, 22:14, 30:5, 30:9, 32:18, 33:16, 60:1, 68:9
listed [1] - 82:23
lists [2] - 59:16, 138:21
live [6] - 56:17, 67:13, 75:1, 75:4, 83:22, 139:3
lives [2] - 108:4, 108:6
living [1] - 56:24
LLP [1] - 5:13
load [2] - 137:17, 137:19
loaded [6] - 42:10, 68:23, 134:20, 137:24, 137:25, 138:6
loading [2] - 66:7, 137:16
local [37] - 11:11, 11:15, 12:6, 16:11, 19:19, 20:2, 20:6, 20:24, 26:24, 45:1, 45:2, 45:3, 46:16, 46:19, 49:25, 50:1, 50:16, 53:15, 58:17, 58:21, 65:16, 66:18, 72:14, 97:9, 102:12, 102:13, 103:13, 105:23, 106:1, 117:24, 119:15, 119:18, 119:22, 128:11, 129:1, 147:1
local-based [1] - 50:16
locals [3] - 45:6, 54:11, 106:12
locate [2] - 118:1,

137:2
located [7] - 12:17, 31:24, 74:6, 83:11, 84:12, 84:13, 84:21
location [3] - 20:18, 88:12, 130:8
locations [4] - 21:5, 31:6, 91:23, 143:20
log [1] - 68:9
logged [1] - 33:23
logic [1] - 123:3
longitude [8] - 13:21, 13:22, 19:5, 19:7, 19:22, 19:24, 30:16, 40:25
look [37] - 8:18, 20:16, 22:24, 25:10, 33:24, 34:4, 38:2, 39:22, 41:5, 44:15, 46:5, 46:7, 47:18, 49:11, 49:22, 53:2, 56:8, 67:5, 68:4, 70:9, 73:19, 97:2, 100:5, 102:12, 107:23, 110:19, 110:20, 111:10, 114:22, 114:25, 116:9, 118:8, 122:1, 123:7, 124:20, 133:22
looked [6] - 22:23, 76:11, 98:11, 104:13, 114:20, 144:20
looking [24] - 27:19, 33:22, 37:1, 55:20, 64:17, 65:22, 67:1, 80:9, 81:25, 100:6, 103:8, 103:9, 103:10, 104:24, 115:24, 116:3, 124:3, 124:18, 128:12, 134:12, 137:22, 138:1, 142:17, 146:18
looks [1] - 139:22
LR [44] - 42:11, 42:15, 42:16, 42:24, 43:5, 64:10, 64:11, 67:6, 68:17, 68:22, 70:13, 77:24, 82:2, 82:14, 82:18, 84:3, 84:12, 85:5, 85:6, 85:10, 100:13, 100:25, 102:7, 102:11, 102:14, 102:16, 103:11, 108:12, 108:18, 111:5, 122:3, 122:14, 123:9, 124:5, 124:6, 127:2, 127:12, 127:16, 128:10, 141:5, 141:18,

142:20, 143:7, 143:13
LTSB [43] - 15:22, 16:3, 16:17, 16:25, 17:17, 21:8, 21:9, 21:13, 22:11, 22:15, 23:4, 42:17, 43:11, 52:14, 61:14, 65:15, 70:2, 77:22, 78:4, 78:9, 78:12, 78:13, 78:22, 78:25, 79:6, 79:13, 79:16, 79:18, 80:1, 80:4, 80:15, 81:11, 81:18, 83:3, 85:4, 101:16, 101:19, 110:8, 110:9, 122:14, 123:18, 127:13, 144:5
LTSB's [1] - 143:7
LTSB-based [4] - 61:14, 70:2, 123:18, 144:5

M

Madison [6] - 1:20, 4:12, 4:20, 5:3, 5:7, 148:10
magnitude [2] - 48:14, 145:12
mail [1] - 96:21
mailing [1] - 18:8
Main [2] - 4:20, 5:7
maintain [5] - 95:11, 95:15, 95:16, 95:18
maintained [6] - 11:22, 11:23, 12:2, 24:19, 52:7, 68:8
majority [1] - 19:12
manageable [1] - 62:5
managed [1] - 129:9
management [4] - 11:6, 64:5, 106:5, 144:1
manager [6] - 6:3, 6:5, 6:9, 9:8, 10:3, 10:6
manner [1] - 19:10
MANZANET [1] - 1:6
map [27] - 3:13, 41:9, 41:11, 41:12, 42:9, 85:9, 85:10, 99:13, 102:16, 107:25, 111:12, 116:4, 116:13, 124:5, 124:6, 134:13, 134:17, 135:1, 136:5, 136:12, 136:15, 137:3, 137:10, 137:13, 137:14, 139:22

mapping [2] - 14:25, 18:24
Maps [1] - 17:14
maps [39] - 17:14, 26:15, 51:21, 67:6, 67:12, 67:17, 68:16, 68:17, 68:22, 70:13, 77:24, 77:25, 82:2, 82:14, 82:18, 84:3, 84:12, 85:5, 86:21, 87:3, 87:11, 99:6, 99:7, 122:3, 122:14, 122:17, 123:9, 123:19, 127:2, 127:16, 128:10, 135:11, 135:12, 135:13, 140:6, 141:5, 141:18, 142:20, 143:7
Marathon [1] - 146:20
March [2] - 28:20, 90:7
margin [2] - 45:20, 132:19
MARIA [1] - 5:6
mark [3] - 72:17, 75:14, 75:22
marked [7] - 8:5, 8:8, 38:3, 38:5, 63:12, 72:18, 72:21
match [4] - 53:16, 97:11, 117:13, 128:13
matches [1] - 61:11
materials [9] - 94:18, 95:2, 95:3, 95:6, 95:7, 95:9, 95:22, 95:23, 96:5
math [3] - 99:23, 99:25
matter [2] - 96:22, 98:7
matters [4] - 8:22, 91:1, 94:8, 148:15
MAXINE [1] - 1:5
Mayer [1] - 5:16
mean [27] - 17:7, 23:23, 32:20, 59:7, 61:19, 65:6, 69:17, 70:3, 75:21, 75:24, 76:2, 95:5, 104:23, 105:22, 107:16, 113:11, 113:15, 122:5, 122:8, 123:10, 123:23, 125:5, 127:9, 129:7, 140:18, 144:19, 146:18
meaning [3] - 25:10, 26:18, 32:12
means [19] - 99:12, 111:3, 111:4, 111:24,

112:23, 113:9, 113:10, 113:17, 113:19, 114:14, 114:15, 114:16, 120:23, 122:11, 123:17, 127:7, 129:5, 129:8, 142:22
meant [5] - 77:18, 107:13, 107:15, 115:12, 138:24
measure [2] - 11:24, 12:19
measurement [1] - 12:14
meet [1] - 79:6
meeting [2] - 79:1, 79:23
meets [1] - 45:14
Members [3] - 1:13, 2:12, 4:4
members [2] - 90:18, 94:5
memo [31] - 41:3, 41:5, 43:25, 45:10, 45:11, 46:4, 49:15, 49:17, 49:20, 50:6, 50:9, 52:17, 58:19, 62:1, 63:13, 64:20, 65:18, 66:16, 67:4, 70:19, 70:23, 78:13, 90:21, 96:17, 97:2, 111:3, 111:17, 111:21, 111:24, 121:25, 147:2
memoranda [1] - 89:9
memorandum [1] - 96:21
memos [5] - 22:23, 25:17, 89:23, 91:17, 144:20
mentioned [5] - 11:7, 16:2, 17:25, 30:25, 105:7
meters [12] - 25:12, 26:5, 45:15, 45:19, 45:20, 99:8, 104:2, 105:3, 111:6, 132:3, 132:18, 132:25
method [1] - 19:14
Meyer [11] - 6:1, 6:2, 8:7, 38:7, 72:20, 86:10, 98:18, 99:3, 130:2, 133:22, 146:13
MEYER [5] - 1:19, 3:3, 4:1, 5:19, 148:12
MICHAEL [2] - 1:15, 2:14
Microsoft [2] - 18:21, 19:1

mid [2] - 16:19, 90:7
mid-March [1] - 90:7
mid-October [1] - 16:19
middle [1] - 28:20
might [26] - 16:11, 16:12, 32:3, 35:1, 46:25, 58:24, 89:12, 89:17, 89:21, 89:24, 90:1, 90:22, 91:21, 92:9, 99:14, 110:9, 110:14, 111:11, 111:12, 114:22, 114:25, 115:10, 117:13, 124:6, 128:18, 136:24
mile [1] - 73:13
Milwaukee [6] - 4:23, 5:10, 5:13, 85:22, 85:24, 87:21
mind [1] - 46:4
minus [13] - 25:12, 26:5, 45:15, 45:16, 99:8, 99:9, 99:10, 99:11, 104:2, 105:3, 111:6, 132:3, 132:18
minute [4] - 13:23, 25:21, 50:7, 86:5
minutes [2] - 63:15, 133:18
misalignment [3] - 91:4, 91:7, 94:20
misalignments [1] - 94:11
modify [1] - 54:9
modifying [1] - 27:22
moment [4] - 92:20, 119:1, 121:4, 132:13
Monday [3] - 51:10, 51:11, 58:1
Monroe [3] - 76:23, 77:2, 146:19
monthly [1] - 18:8
months [1] - 141:25
MOORE [2] - 1:6, 1:10
morning [3] - 89:11, 91:19, 96:5
most [4] - 21:18, 62:1, 68:14, 71:6
movement [1] - 49:1
MR [99] - 32:7, 37:16, 44:12, 45:5, 47:4, 48:17, 49:3, 53:22, 54:6, 54:19, 55:5, 55:11, 69:20, 74:16, 75:5, 75:20, 75:21, 75:24, 76:5, 77:4, 83:13, 83:18, 83:24, 85:3, 86:4, 86:7, 92:1,

92:18, 93:10, 98:15, 98:18, 98:22, 98:24, 99:16, 99:22, 100:8, 100:22, 101:5, 101:9, 101:14, 101:23, 102:20, 102:25, 103:6, 103:18, 103:23, 104:10, 104:21, 105:18, 106:8, 106:19, 107:6, 108:8, 108:24, 109:11, 111:15, 111:19, 115:7, 115:19, 116:25, 117:8, 117:16, 117:21, 118:4, 118:22, 119:10, 122:6, 122:9, 122:21, 124:1, 124:10, 125:1, 125:7, 125:21, 126:11, 127:20, 128:2, 128:8, 128:16, 128:21, 129:17, 129:23, 131:6, 131:13, 131:16, 133:17, 133:19, 138:23, 139:12, 143:3, 143:14, 143:22, 144:10, 145:23, 146:6, 146:8, 147:5, 147:7, 147:8
MS [1] - 63:14
multiple [1] - 45:21
municipal [96] - 20:5, 20:8, 20:12, 20:20, 20:24, 21:16, 26:18, 26:24, 27:12, 27:19, 28:6, 31:3, 31:5, 31:18, 31:19, 31:22, 33:3, 34:19, 34:24, 35:1, 35:25, 36:22, 40:12, 40:14, 40:16, 40:19, 40:21, 40:23, 42:20, 44:2, 44:6, 44:10, 44:23, 44:25, 45:2, 45:7, 45:25, 46:6, 46:19, 53:10, 57:15, 57:17, 59:12, 60:8, 60:13, 61:20, 64:24, 66:7, 68:21, 69:4, 69:14, 70:4, 71:21, 73:12, 76:14, 77:23, 77:25, 78:16, 85:17, 91:4, 91:7, 92:16, 93:9, 93:20, 94:3, 94:20, 95:18, 96:10, 102:14, 103:10, 103:12, 106:12, 110:21, 111:13, 112:8, 112:13, 114:6, 114:9,

114:17, 115:4, 115:13, 115:16, 115:23, 119:1, 119:4, 119:13, 125:3, 125:25, 132:6, 132:16, 134:6, 134:23, 140:24, 141:14, 144:21, 146:1
Municipal [1] - 3:13
municipalities [36] - 11:11, 19:21, 27:8, 31:25, 42:25, 45:1, 48:9, 57:2, 58:21, 71:6, 77:16, 100:12, 100:25, 101:22, 102:7, 105:11, 105:14, 106:23, 106:25, 107:2, 108:14, 109:15, 109:20, 109:24, 110:3, 113:14, 113:18, 116:5, 116:8, 119:25, 120:2, 125:16, 130:18, 130:23, 142:4, 146:3
municipality [30] - 26:20, 44:15, 44:18, 46:10, 46:24, 70:15, 103:17, 103:19, 109:9, 110:13, 112:18, 115:11, 116:15, 117:3, 117:11, 117:18, 117:25, 120:7, 120:13, 121:12, 122:2, 123:24, 124:18, 124:20, 125:11, 126:3, 126:16, 131:10, 132:9, 132:10
must [1] - 120:19

N

name [5] - 5:25, 12:12, 90:20, 132:22, 132:24
named [1] - 148:11
Nat [1] - 90:16
nature [2] - 44:21, 104:9
near [1] - 121:5
necessarily [5] - 30:15, 31:7, 125:23, 128:13, 136:23
necessary [3] - 84:20, 108:2, 137:9
need [17] - 7:7, 7:9, 7:13, 8:13, 15:7, 28:17, 29:13, 29:16,

51:4, 56:9, 58:9, 63:15, 73:25, 75:15, 106:13, 112:16, 137:11

needed [4] - 10:1, 11:3, 84:9, 126:13

needs [3] - 28:22, 29:15, 34:8

negating [1] - 112:15

never [2] - 15:12, 64:11

new [9] - 13:13, 14:1, 15:4, 15:18, 40:1, 43:1, 81:3, 85:7, 96:9

newspaper [1] - 87:20

next [25] - 8:15, 13:11, 13:12, 15:10, 21:6, 24:12, 24:14, 40:9, 42:23, 45:11, 46:5, 51:16, 52:1, 53:8, 55:15, 57:20, 58:25, 60:4, 61:24, 67:14, 71:18, 77:21, 80:22, 113:4, 128:25

NICHOL [2] - 1:15, 2:14

nine [6] - 73:15, 73:20, 73:23, 74:11, 74:14, 75:6

normally [1] - 22:11

North [2] - 4:23, 5:10

Nos [2] - 3:18, 3:19

notarial [1] - 149:4

Notary [3] - 4:9, 148:4, 149:7

note [3] - 67:1, 75:14, 75:16

noted [1] - 34:5

nothing [7] - 96:24, 120:9, 137:13, 147:6, 147:7, 147:8, 148:13

Notice [1] - 3:12

notice [11] - 4:7, 8:2, 8:11, 8:13, 8:16, 8:19, 88:25, 91:2, 94:9, 148:6

November [8] - 38:13, 46:5, 49:10, 49:11, 59:19, 66:16, 70:19, 89:8

number [39] - 6:20, 19:14, 22:12, 25:8, 25:23, 26:8, 26:9, 33:11, 34:11, 34:14, 35:7, 35:15, 35:19, 35:25, 66:17, 69:6, 81:25, 82:16, 83:2, 91:3, 94:1, 94:17, 95:10, 95:22, 96:25,

97:15, 103:4, 123:1, 136:16, 137:1, 137:3, 137:5, 137:12, 138:2, 139:23, 142:18

numbered [5] - 81:22, 84:22, 121:7, 121:19, 142:15

numbers [13] - 8:17, 35:12, 80:4, 121:20, 122:16, 134:7, 134:8, 134:9, 134:10, 136:2, 136:4, 138:21

numerous [2] - 17:12, 41:14

O

oath [2] - 5:21, 148:16

object [34] - 7:4, 7:5, 37:16, 99:16, 99:22, 100:8, 100:22, 101:5, 101:14, 101:23, 102:20, 102:25, 104:10, 104:21, 105:18, 106:8, 106:19, 107:6, 108:8, 108:24, 109:11, 115:7, 115:19, 117:8, 122:21, 124:1, 124:10, 125:1, 125:7, 125:21, 128:2, 128:16, 131:6, 131:13

objection [45] - 32:7, 44:12, 45:5, 47:4, 48:17, 49:3, 53:22, 54:6, 54:19, 55:5, 55:11, 69:20, 74:16, 75:5, 75:20, 83:13, 83:18, 83:24, 85:3, 101:10, 103:6, 103:18, 103:23, 111:15, 111:19, 116:25, 117:16, 117:21, 118:4, 118:22, 119:10, 119:11, 122:9, 126:11, 127:20, 128:21, 129:17, 129:23, 131:17, 143:3, 143:14, 143:22, 144:10, 145:23, 146:6

obligation [1] - 119:5

obtain [1] - 30:2

obtaining [2] - 33:19, 33:20

obviously [1] - 93:13

Obviously [3] - 48:5, 77:11, 113:4

occur [7] - 21:10, 40:17, 44:16, 81:19, 104:5, 104:14, 104:16

occurring [1] - 83:8

October [3] - 16:18, 16:19, 21:11

OF [5] - 1:1, 5:6, 148:1, 148:2

offhand [1] - 146:15

offices [2] - 4:10, 148:8

official [2] - 1:14, 2:13

officials [1] - 20:2

OLGA [1] - 2:9

once [8] - 13:6, 15:7, 17:24, 21:4, 24:10, 108:5, 142:24

one [40] - 6:20, 17:13, 25:8, 25:25, 26:8, 26:15, 33:18, 36:22, 36:23, 37:12, 40:16, 45:25, 65:11, 67:13, 68:19, 69:2, 69:5, 76:10, 78:10, 100:20, 103:24, 104:13, 104:25, 108:12, 112:17, 115:24, 118:16, 122:22, 123:11, 124:12, 128:22, 128:25, 132:6, 132:9, 132:17, 138:14, 138:17, 141:1, 141:3, 145:18

One [1] - 4:20

one-third [3] - 68:19, 69:2, 69:5

ones [11] - 20:25, 28:21, 42:1, 50:3, 57:17, 84:21, 85:17, 104:12, 132:11, 140:16, 147:3

ongoing [6] - 27:5, 27:6, 28:4, 28:7, 31:10, 66:13

opportunity [2] - 6:22, 49:11

opposed [4] - 20:3, 20:8, 35:13, 145:21

order [4] - 62:2, 112:7, 112:12, 120:20

original [3] - 3:18, 3:19, 3:24

originally [6] - 32:4, 36:1, 36:23, 57:17, 85:1, 85:4

otherwise [1] - 76:2

ought [1] - 118:21

ourselves [2] - 6:11,

37:25

Outagamie [1] - 87:7

output [4] - 82:20, 83:9, 83:20, 140:6

overall [1] - 82:23

overlaid [2] - 116:12, 122:15

overlain [1] - 136:11

overlay [4] - 115:14, 134:18, 135:1, 135:13

overlaying [1] - 102:15

overturned [1] - 67:17

own [6] - 20:8, 44:9, 44:15, 80:3, 98:9, 102:16

P

p.m [1] - 147:10

page [39] - 8:14, 8:15, 8:17, 8:18, 8:19, 39:24, 41:7, 43:17, 51:16, 51:19, 59:9, 65:21, 65:22, 67:5, 68:13, 69:12, 69:13, 70:5, 73:1, 77:9, 78:11, 78:14, 88:25, 97:3, 110:20, 114:3, 114:4, 118:7, 120:16, 121:5, 126:20, 140:23, 142:14, 142:15, 142:16, 144:16

Pages [1] - 3:2

pages [1] - 8:10

paragraph [54] - 39:21, 39:25, 40:5, 40:6, 41:8, 42:8, 43:18, 45:11, 46:7, 47:23, 47:24, 48:4, 49:6, 51:18, 51:19, 55:20, 57:20, 58:7, 66:2, 66:4, 67:9, 68:14, 70:10, 71:19, 73:10, 77:8, 77:9, 77:21, 80:22, 81:25, 82:12, 82:16, 94:8, 94:17, 95:10, 95:22, 96:23, 96:25, 97:8, 97:22, 98:7, 110:20, 110:22, 112:5, 112:7, 114:4, 118:9, 120:17, 121:6, 121:10, 126:20, 141:3

paragraphs [5] - 55:15, 81:21, 84:11, 84:22, 142:16

parens [1] - 45:16

part [14] - 15:18, 21:18, 41:4, 54:25, 59:1, 68:10, 69:22, 82:22, 84:9, 84:17, 88:9, 118:13, 140:15, 140:18

particular [12] - 6:6, 7:23, 9:25, 39:20, 41:2, 53:2, 72:5, 85:1, 88:18, 88:20, 91:12, 125:17

parties [4] - 17:12, 109:8, 148:23, 149:1

party [3] - 108:22, 109:2, 109:4

passed [1] - 9:17

passing [1] - 42:4

past [5] - 129:3, 130:1, 145:22, 145:25, 146:2

pattern [1] - 80:11

PAUL [1] - 2:4

PELLETTER [1] - 148:3

Pelleter [2] - 1:21, 4:8

pending [1] - 4:5

people [10] - 35:8, 37:3, 91:3, 91:22, 93:3, 94:2, 139:3, 139:9, 142:2, 142:7

percent [5] - 29:23, 34:17, 34:23, 35:7, 36:2

percentage [2] - 34:23, 35:14

percentage-wise [1] - 34:23

PEREZ [1] - 2:9

perform [3] - 80:25, 81:7, 81:9

performed [16] - 14:11, 70:7, 71:16, 72:6, 78:5, 80:1, 80:15, 80:23, 81:1, 81:21, 85:21, 92:8, 92:9, 92:13, 96:16, 145:6

performing [1] - 81:24

period [2] - 13:18, 141:25

person [7] - 33:24, 108:3, 108:5, 108:21, 126:9, 126:14, 148:12

person's [1] - 132:22

personally [1] - 104:12

personnel [1] - 68:21

perspective [7] -

6:13, 10:9, 12:25, 13:1, 13:2, 21:15, 126:12
  pertain [1] - 85:6
  pertaining [1] - 31:24
  pertains [3] - 82:7, 82:8, 82:9
  PETRI [1] - 2:4
  Phase [2] - 57:20, 59:1
  pick [1] - 146:23
  picking [1] - 101:2
  pictures [3] - 76:16, 76:20, 83:6
  piece [1] - 136:7
  place [18] - 28:12, 53:12, 58:8, 95:24, 99:13, 107:18, 108:23, 109:2, 117:19, 118:12, 124:23, 130:24, 132:5, 134:2, 138:6, 144:24, 144:25
  placed [45] - 25:11, 25:13, 26:10, 32:12, 32:21, 32:23, 45:21, 46:10, 46:23, 47:1, 48:1, 54:22, 55:3, 56:23, 59:15, 69:25, 70:14, 73:16, 73:22, 74:10, 82:1, 82:13, 82:17, 83:11, 83:16, 83:23, 84:2, 84:4, 107:24, 108:10, 122:2, 123:8, 123:10, 123:16, 123:21, 123:24, 126:16, 126:19, 127:19, 131:10, 142:19, 142:23, 143:1, 143:10, 144:4
  placement [1] - 143:23
  places [3] - 41:1, 95:24, 132:10
  placing [1] - 130:8
  Plaintiffs [8] - 1:9, 1:11, 2:10, 4:2, 4:3, 4:21, 4:24, 5:4
  plan [1] - 61:23
  plans [1] - 29:5
  play [2] - 9:25, 10:16
  played [1] - 10:22
  plus [14] - 18:5, 25:12, 26:5, 45:15, 45:16, 99:8, 99:9, 99:10, 99:11, 104:2, 105:3, 111:6, 132:3, 132:18

  point [6] - 9:15, 29:24, 55:7, 107:24, 108:10, 123:1
  pointing [1] - 74:4
  Poland [7] - 3:4, 3:25, 5:24, 86:9, 104:8, 107:9, 139:16
  POLAND [65] - 4:19, 75:21, 76:5, 77:4, 86:4, 86:7, 92:1, 98:15, 98:18, 99:16, 99:22, 100:8, 100:22, 101:5, 101:9, 101:14, 101:23, 102:20, 102:25, 103:6, 103:18, 103:23, 104:10, 104:21, 105:18, 106:8, 106:19, 107:6, 108:8, 108:24, 109:11, 111:15, 111:19, 115:7, 115:19, 116:25, 117:8, 117:16, 117:21, 118:4, 118:22, 119:10, 122:6, 122:9, 122:21, 124:1, 124:10, 125:1, 125:7, 125:21, 126:11, 127:20, 128:2, 128:8, 128:16, 128:21, 129:17, 129:23, 131:6, 131:13, 131:16, 133:19, 139:13, 146:8, 147:7
  political [1] - 116:4
  poll [3] - 28:13, 53:13, 59:16
  population [23] - 48:6, 48:15, 48:23, 49:2, 77:12, 77:18, 94:19, 94:23, 95:8, 95:12, 95:15, 95:16, 95:18, 109:9, 109:21, 109:25, 113:6, 113:12, 113:14, 113:18, 113:19, 125:6
  populations [1] - 109:16
  position [3] - 109:19, 110:1, 118:25
  positional [1] - 45:13
  possession [2] - 140:12
  possibilities [1] - 124:15
  possibility [2] - 55:6, 105:4
  possible [10] - 33:18, 62:2, 62:7, 62:16,

76:24, 77:7, 103:21, 103:24, 105:1, 136:5
  potential [3] - 56:22, 65:13, 116:19
  potentially [5] - 37:18, 91:3, 94:2, 94:23, 115:9
  practical [1] - 40:10
  practice [1] - 120:19
  precise [1] - 68:22
  precisely [3] - 53:17, 97:11, 127:18
  prefer [1] - 75:23
  preliminarily [1] - 96:15
  preparation [1] - 93:14
  prepared [6] - 72:5, 72:13, 72:14, 73:4, 73:8, 82:22
  prescribed [1] - 63:5
  Present [1] - 5:16
  previous [2] - 26:14, 69:1
  previously [8] - 14:24, 37:12, 38:2, 62:18, 66:16, 70:23, 129:9, 129:12
  primarily [2] - 18:10, 19:22
  primary [4] - 18:20, 35:5, 51:6, 90:7
  print [2] - 28:13, 140:5
  printed [1] - 33:14
  printout [1] - 136:4
  prioritized [1] - 28:21
  problem [2] - 49:13, 145:11
  problematic [1] - 53:9
  process [50] - 10:16, 10:25, 15:16, 20:19, 20:20, 21:6, 24:13, 24:21, 25:1, 27:4, 27:22, 28:4, 28:7, 28:9, 29:1, 29:6, 29:10, 29:17, 31:10, 34:7, 34:22, 36:2, 39:5, 47:16, 50:18, 51:24, 53:5, 54:25, 58:24, 60:12, 63:18, 63:24, 66:14, 67:22, 71:15, 87:16, 87:17, 87:23, 88:9, 90:5, 90:9, 101:6, 102:6, 130:12, 139:8, 141:21, 142:2, 142:11, 144:8, 144:14

  produce [1] - 135:24
  produced [3] - 19:10, 133:13, 133:16
  Professional [4] - 1:22, 4:8, 148:4, 149:8
  Professor [1] - 5:16
  progress [1] - 14:5
  progressed [1] - 34:12
  prohibition [1] - 97:14
  project [13] - 6:3, 6:5, 6:9, 9:8, 9:22, 10:3, 10:4, 10:6, 11:2, 13:7, 13:11, 64:5, 90:10
  projected [7] - 12:20, 17:8, 17:14, 23:6, 28:14, 61:7, 61:12
  projection [7] - 17:5, 17:6, 17:11, 28:8, 34:25, 61:11, 89:6
  projections [1] - 23:6
  Prospect [1] - 4:23
  provide [4] - 19:25, 38:25, 61:9, 86:20
  provided [16] - 3:18, 3:19, 17:17, 18:6, 21:9, 71:5, 71:20, 78:9, 81:18, 82:25, 83:4, 83:5, 100:14, 101:19, 109:23, 133:24
  providers [1] - 50:22
  Public [3] - 4:9, 148:4, 149:7
  pull [2] - 134:13, 139:21
  pulled [1] - 140:7
  pulling [1] - 37:2
  purchase [1] - 18:25
  purchased [1] - 18:5
  purpose [3] - 7:15, 21:12, 28:9
  purposes [7] - 11:6, 50:5, 53:9, 95:13, 95:14, 95:17, 95:19
  pursuant [2] - 4:7, 148:6
  put [11] - 18:11, 31:16, 55:22, 75:22, 117:5, 118:25, 120:14, 124:4, 125:12, 131:4, 143:18
  puts [2] - 107:18, 111:14
  putting [2] - 125:16, 126:4

Q

  qualified [1] - 148:5
  quantify [2] - 17:4, 141:24
  quantities [1] - 34:6
  questions [18] - 6:21, 6:22, 6:23, 6:24, 7:2, 7:4, 38:17, 39:20, 39:23, 46:18, 50:7, 75:25, 89:25, 98:19, 107:9, 139:13, 139:19, 146:9
  quickly [1] - 99:25
  quite [2] - 67:2, 116:15
  quote [1] - 78:14

R

  Racine [3] - 85:25, 86:1
  RAMIREZ [1] - 2:9
  RAMIRO [1] - 2:9
  ranges [5] - 14:23, 129:2, 129:10, 129:11, 129:25
  rather [1] - 59:13
  RE [1] - 139:15
  RE-EXAMINATION [1] - 139:15
  reach [1] - 62:5
  reached [1] - 96:15
  read [11] - 45:12, 47:23, 77:4, 77:6, 92:1, 92:3, 96:12, 114:8, 118:13, 128:25, 138:10
  readily [2] - 120:9, 120:11
  reading [4] - 42:9, 45:10, 78:14, 148:20
  reads [2] - 97:9, 118:10
  real [1] - 99:25
  really [4] - 7:21, 13:3, 18:10, 111:22
  reason [12] - 40:16, 103:16, 104:13, 105:1, 105:2, 110:9, 110:13, 115:9, 122:25, 124:12, 127:14, 128:22
  reasons [4] - 104:15, 118:16, 124:13, 124:16
  receive [6] - 19:1, 31:17, 61:13, 63:23,

13

51 of 56 sheets
Case 2:11-cv-00562-JPS-DEW-RMD   Filed 02/30/12   Page 51 of 56   Document 172
WWW.FORTHERECORDMADISON.COM   (608) 833-0392
Page 13 to 13 of 18

88:5, 117:23

received [34] - 8:1, 15:21, 16:2, 19:4, 19:7, 21:8, 22:14, 23:3, 27:7, 43:10, 49:25, 50:3, 50:9, 50:14, 60:19, 61:2, 61:5, 65:14, 65:16, 66:12, 73:5, 81:11, 81:13, 88:20, 114:18, 122:12, 122:13, 123:14, 123:15, 127:11, 131:24, 146:25, 147:1

receiving [3] - 27:18, 61:19, 61:20

recent [1] - 49:16

Recess [2] - 86:6, 133:20

recess [1] - 98:17

recollection [2] - 146:16, 146:21

recommend [2] - 20:5, 29:9

recommendation [1] - 29:12

reconcile [1] - 26:25

reconciling [4] - 27:9, 27:13, 27:14, 29:17

record [4] - 5:25, 7:16, 74:1, 148:19

recorded [3] - 12:3, 12:4, 36:23

records [1] - 36:19

recreate [1] - 136:6

red [4] - 134:2, 134:3, 134:4, 134:10

redistricting [37] - 6:9, 6:16, 9:16, 9:20, 9:22, 10:7, 10:16, 10:25, 11:5, 13:14, 15:4, 21:7, 24:13, 26:15, 39:4, 39:13, 40:4, 42:6, 55:16, 59:1, 63:18, 63:24, 64:1, 64:4, 64:6, 64:24, 65:10, 65:23, 90:10, 95:13, 95:14, 95:21, 118:8, 129:9, 130:1, 145:15, 145:17

redone [1] - 15:7

reduced [1] - 148:17

refer [15] - 8:17, 11:18, 22:16, 32:11, 35:8, 40:14, 49:19, 69:19, 69:24, 91:14, 95:6, 134:9, 134:10, 143:4

reference [14] - 41:6,

43:3, 43:19, 49:5, 55:19, 59:10, 60:4, 64:23, 68:17, 72:8, 73:10, 77:21, 97:18, 141:10

referenced [1] - 62:17

references [1] - 42:4

referred [12] - 22:18, 25:15, 25:16, 56:3, 61:23, 65:3, 65:17, 71:7, 72:3, 84:22, 86:11, 130:2

referring [20] - 11:19, 23:12, 35:24, 40:5, 41:16, 58:14, 60:18, 61:1, 64:21, 65:5, 85:4, 88:4, 95:8, 106:10, 112:24, 127:10, 132:16, 144:16, 144:18, 144:23

refers [9] - 57:20, 62:15, 69:23, 73:23, 80:22, 115:3, 127:23, 141:12, 143:5

reflect [2] - 53:10, 96:8

reflected [2] - 49:16, 96:16

reflects [1] - 61:18

regard [1] - 127:23

regarding [7] - 40:11, 89:5, 91:6, 92:25, 93:19, 94:10, 95:23

regards [9] - 22:11, 31:14, 64:1, 102:10, 103:7, 106:4, 123:12, 133:25, 143:4

regenerate [1] - 61:15

Registered [4] - 1:22, 4:8, 148:3, 149:8

registered [18] - 13:15, 13:16, 26:20, 82:1, 82:13, 82:16, 83:10, 83:15, 83:22, 95:23, 103:4, 122:1, 123:8, 132:8, 142:18, 142:22, 142:25, 143:16

registration [11] - 9:23, 10:8, 11:4, 11:7, 11:10, 12:25, 30:5, 30:9, 32:17, 48:23, 67:19

Registration [1] - 11:19

registrations [1] - 11:13

rehash [1] - 67:2

REID [1] - 2:5

Reinhart [1] - 98:10

REINHART [1] - 5:9

relate [1] - 78:1

related [4] - 38:17, 94:18, 95:21, 148:22

relative [1] - 148:25

released [8] - 27:24, 28:1, 30:18, 30:24, 32:14, 32:18, 32:24, 79:9

relied [3] - 58:17, 70:11, 79:21

relies [1] - 120:2

rely [3] - 12:23, 50:22, 109:2

relying [2] - 108:22, 125:24

remain [1] - 15:10

remains [1] - 29:19

repeat [3] - 25:21, 77:3, 96:11

repeated [2] - 48:10, 49:6

rephrase [12] - 7:9, 7:11, 11:25, 30:23, 52:9, 54:20, 63:2, 84:14, 91:25, 100:24, 115:21, 118:24

report [11] - 56:20, 57:1, 68:9, 96:21, 130:20, 131:11, 132:22, 132:23, 133:8, 133:9, 133:13

reported [1] - 70:13

reporter [4] - 6:25, 8:8, 72:21, 74:1

Reporter [4] - 1:22, 4:9, 148:4, 149:8

reports [22] - 10:13, 55:21, 56:2, 56:7, 56:16, 56:17, 57:5, 57:9, 62:11, 69:14, 70:4, 91:20, 91:21, 130:3, 130:6, 130:7, 130:24, 131:18, 131:21, 132:14, 140:24

represent [4] - 39:10, 134:4, 134:8, 136:23

representation [4] - 41:19, 72:12, 72:24, 76:3

representational [1] - 60:6

representations [5] -

75:17, 76:8, 76:12, 76:13, 77:1

representative [2] - 8:20, 8:25

representatives [2] - 14:10, 20:2

represented [2] - 135:25, 143:9

representing [2] - 7:6, 93:18

represents [1] - 134:6

request [6] - 20:6, 20:13, 30:4, 59:20, 59:24, 66:17

requested [2] - 51:6, 51:13

requests [1] - 20:7

require [1] - 97:12

required [2] - 126:5, 126:17

requirements [4] - 11:2, 13:6, 13:10, 39:9

resides [1] - 40:25

resolution [4] - 89:7, 89:13, 89:19, 90:23

resolve [1] - 144:15

resolving [1] - 144:8

respect [12] - 9:20, 24:23, 27:8, 44:22, 63:1, 65:10, 73:1, 75:9, 91:12, 99:6, 99:7, 130:11

respective [1] - 94:22

responses [1] - 27:7

responsibilities [2] - 6:6, 10:4

responsibility [1] - 39:3

responsible [2] - 12:8, 119:18

restate [1] - 79:14

result [7] - 27:17, 27:19, 30:17, 42:2, 142:12, 144:8, 144:14

results [4] - 53:11, 81:20, 82:20, 82:21

review [3] - 78:7, 78:12, 79:1

revised [1] - 96:8

RIBBLE [1] - 2:5

RICHARD [2] - 1:6

RISSEEUW [1] - 1:7

RMD [1] - 2:12

Robinson [1] - 90:16

ROBSON [1] - 1:7

ROCHELLE [1] - 1:6

Rock [21] - 46:8,

46:15, 47:18, 47:20, 70:11, 70:22, 70:25, 71:2, 71:6, 71:16, 71:19, 73:8, 74:18, 74:21, 74:24, 75:8, 75:10, 76:17, 112:13, 133:25, 146:18

ROGERS [1] - 1:7

role [7] - 9:7, 9:24, 10:16, 10:22, 38:14, 38:16, 39:7

rolled [1] - 57:23

RON [1] - 1:4

RONALD [2] - 1:3, 1:10

rules [2] - 6:20, 39:12

run [1] - 131:20

RYAN [1] - 2:4

S

S.C [5] - 4:10, 4:19, 5:3, 5:9, 148:9

SANCHEZ [1] - 1:7

SANCHEZ-BELL [1] - 1:7

sanitary [2] - 21:22, 59:4

SARAH [1] - 148:3

Sarah [7] - 1:21, 4:8, 39:2, 39:4, 39:6, 46:17, 90:15

saw [2] - 38:13, 83:20

SCHLIEPP [1] - 1:7

school [16] - 11:15, 21:22, 22:3, 22:6, 23:25, 24:4, 26:12, 26:13, 31:19, 44:3, 50:14, 58:15, 59:4, 62:20, 134:24, 145:1

scope [1] - 10:5

SCOTT [1] - 5:2

screen [2] - 136:6, 139:21

seal [1] - 149:4

SEAN [1] - 2:5

search [1] - 18:22

second [23] - 26:3, 40:1, 43:17, 43:18, 46:7, 55:19, 58:7, 67:10, 70:9, 71:18, 71:19, 77:8, 77:10, 91:1, 97:7, 98:16, 112:5, 114:3, 114:5, 118:9, 120:6, 120:13, 120:16

second-guess [2] -

14

120:6, 120:13

section [4] - 46:5, 61:24, 70:3, 140:24

see [78] - 8:9, 8:12, 8:23, 22:7, 33:24, 36:7, 38:11, 39:25, 40:4, 40:8, 40:12, 41:9, 42:13, 43:1, 43:18, 43:20, 44:4, 44:15, 45:23, 46:11, 48:2, 48:12, 49:8, 49:12, 51:19, 51:23, 52:4, 55:17, 55:24, 58:10, 59:17, 60:10, 61:24, 62:8, 64:25, 65:23, 65:24, 66:9, 67:7, 67:19, 68:17, 68:23, 69:15, 70:16, 71:12, 71:24, 73:17, 77:16, 78:2, 78:19, 84:3, 89:1, 89:9, 91:9, 94:12, 94:25, 96:2, 97:5, 97:16, 105:1, 110:24, 112:9, 112:11, 112:20, 113:7, 114:5, 114:12, 120:21, 121:7, 121:15, 122:3, 124:8, 126:23, 127:5, 129:3, 141:8, 142:20

seeing [2] - 76:4, 103:14

senate [35] - 16:6, 16:24, 21:17, 24:7, 36:8, 36:16, 37:8, 37:21, 47:2, 52:12, 54:9, 54:12, 54:15, 55:13, 60:9, 60:24, 63:4, 71:24, 75:3, 81:16, 82:8, 82:13, 83:16, 101:18, 101:19, 109:17, 109:21, 110:4, 110:6, 110:10, 110:14, 121:14, 138:13, 144:3, 146:4

send [7] - 19:23, 28:12, 31:8, 31:15, 56:7, 56:12, 141:14

sense [1] - 32:20

SENSENBRENNER [1] - 2:4

sent [15] - 13:19, 18:13, 18:19, 19:3, 19:20, 26:23, 31:3, 50:12, 51:7, 56:1, 56:16, 57:1, 57:4, 57:7, 91:17

sentence [37] - 39:22, 40:1, 40:9,

42:23, 43:19, 45:11, 51:20, 52:1, 53:8, 55:20, 58:7, 58:25, 60:4, 66:4, 67:11, 67:14, 71:18, 77:11, 77:16, 110:23, 113:4, 113:24, 113:25, 114:1, 114:2, 114:5, 114:8, 114:12, 115:3, 118:10, 120:18, 126:21, 126:25, 128:7, 128:25, 141:2

sentences [5] - 48:4, 67:10, 68:14, 121:7, 141:1

Sentinel [1] - 87:21

separate [3] - 13:3, 22:5, 33:15

September [5] - 9:9, 9:10, 9:11, 10:15, 145:15

September/ October [1] - 18:17

series [1] - 107:9

service [11] - 13:20, 18:14, 18:18, 18:20, 18:23, 19:4, 19:16, 88:6, 88:15, 88:16, 88:19

services [3] - 18:24, 19:19, 88:22

Services [2] - 42:12, 42:17

set [4] - 51:14, 92:19, 119:13, 149:3

sets [2] - 95:12, 102:18

seven [2] - 8:22, 89:1

Several [1] - 40:9

Shane [2] - 39:2, 90:16

shapefile [8] - 41:12, 41:16, 41:18, 51:7, 54:7, 77:25, 108:11, 108:12

shapefiles [38] - 14:25, 17:4, 23:8, 41:14, 45:13, 50:15, 50:17, 60:20, 61:2, 61:4, 62:20, 63:9, 65:14, 65:15, 68:15, 68:20, 70:12, 81:10, 81:11, 81:12, 81:14, 83:3, 83:4, 84:5, 84:13, 85:17, 86:20, 87:2, 87:10, 101:17, 101:20, 101:21, 102:15, 123:13, 123:14, 134:25, 143:6, 146:25

sheets [1] - 8:10

SHEILA [1] - 1:4

shift [8] - 48:6, 48:14, 49:2, 77:12, 77:18, 109:25, 112:14, 113:5

shifted [1] - 125:6

shifting [4] - 109:9, 109:16, 109:21, 113:17

Short [1] - 98:17

show [5] - 7:20, 59:16, 134:17, 134:18, 134:19

shown [1] - 81:21

shows [2] - 116:4, 136:12

shp [1] - 17:4

side [4] - 39:9, 39:12, 39:13, 92:20

signing [1] - 148:20

similar [13] - 76:16, 92:7, 92:8, 129:1, 129:12, 134:13, 134:17, 135:3, 135:14, 135:18, 135:25, 136:12, 140:16

similarly [1] - 109:14

simply [3] - 60:12, 125:11, 125:16

sit [3] - 35:11, 35:18, 37:9

site [1] - 21:9

sitting [2] - 6:25, 46:22

situation [8] - 22:7, 48:5, 48:10, 49:6, 52:23, 77:11, 113:5, 115:10

situations [1] - 31:21

six [1] - 110:21

sixth [1] - 126:21

slash [1] - 102:1

slightly [1] - 87:15

snapshot [4] - 66:23, 66:25, 82:25, 83:6

software [8] - 18:5, 18:6, 64:12, 64:15, 135:19, 135:21, 135:24, 139:25

someone [4] - 36:21, 73:8, 114:25, 120:12

someplace [1] - 117:5

sometime [1] - 140:21

sometimes [1] - 74:5

somewhere [6] - 100:6, 116:20,

116:22, 117:4, 119:7, 125:12

sorry [4] - 6:13, 27:14, 74:2, 122:6

sort [4] - 16:12, 39:14, 41:20, 111:17

spans [1] - 99:19

speaking [5] - 44:20, 44:24, 65:2, 65:7, 69:22

specific [22] - 6:6, 7:18, 9:2, 9:24, 16:13, 16:18, 17:20, 24:1, 37:7, 44:17, 56:10, 60:23, 64:3, 71:20, 71:22, 72:2, 76:19, 81:9, 87:19, 136:14, 142:23, 143:18

specifically [54] - 9:19, 10:6, 16:5, 16:23, 25:3, 34:16, 44:2, 44:14, 47:14, 47:15, 48:8, 52:25, 53:6, 53:24, 54:7, 55:12, 57:13, 57:16, 58:13, 64:1, 64:5, 65:5, 65:7, 65:21, 70:24, 73:23, 74:17, 75:6, 75:11, 77:14, 79:2, 81:7, 82:6, 85:19, 88:3, 90:13, 96:22, 101:6, 103:20, 104:12, 111:9, 117:6, 121:24, 126:6, 127:23, 134:18, 135:15, 136:3, 137:15, 137:22, 138:10, 141:10, 144:16, 146:15

specifics [3] - 44:14, 52:25, 136:22

specifies [1] - 52:3

speculate [1] - 29:3

split [10] - 21:23, 21:25, 22:2, 22:4, 22:8, 22:13, 22:18, 22:19, 23:25, 24:2

splits [1] - 21:25

splitting [3] - 97:12, 97:14, 112:18

spoken [1] - 65:9

spot [1] - 136:14

spreadsheet [4] - 83:5, 84:8, 84:16, 84:24

spring [2] - 59:5, 59:6

ss [1] - 148:1

staff [5] - 58:9, 58:20, 93:25, 94:15,

142:7

standard [6] - 13:17, 13:19, 17:12, 18:1, 45:14

standards [1] - 57:3

standpoint [1] - 39:3

stands [1] - 34:13

start [7] - 7:25, 9:8, 10:24, 13:8, 13:9, 14:3, 114:4

started [14] - 9:13, 9:14, 9:15, 10:15, 11:1, 14:4, 14:6, 14:17, 34:7, 34:11, 36:14, 68:1, 68:3

starting [1] - 102:6

starts [2] - 41:8, 112:7

State [5] - 4:9, 4:12, 148:5, 148:11, 149:7

STATE [2] - 5:6, 148:1

state [21] - 5:25, 38:18, 42:25, 43:4, 43:5, 57:21, 60:9, 60:23, 68:14, 68:15, 68:19, 68:20, 69:3, 71:23, 125:18, 137:6, 137:19, 137:20, 142:5

statement [9] - 39:25, 68:25, 70:18, 73:17, 77:10, 111:3, 111:23, 127:14, 142:20

statements [1] - 38:23

STATES [1] - 1:1

states [24] - 42:23, 46:8, 48:5, 49:6, 52:1, 52:19, 53:15, 58:7, 58:25, 60:5, 60:21, 62:1, 66:4, 67:6, 67:14, 70:10, 71:19, 73:11, 78:13, 87:25, 97:4, 123:16, 141:3, 142:18

States [2] - 4:6, 18:9

Statewide [1] - 11:19

statewide [8] - 9:22, 10:8, 11:4, 11:7, 11:10, 11:17, 48:24, 67:19

static [1] - 57:2

statute [7] - 52:2, 52:18, 114:12, 114:21, 114:23, 115:1, 120:19

Statutes [1] - 97:16

statutory [2] - 71:22, 72:2

step [6] - 13:12, 14:3, 18:10, 21:6, 24:12, 24:14
steps [2] - 24:25, 81:9
still [6] - 14:14, 43:25, 54:7, 56:15, 85:17, 140:9
stilted [1] - 74:4
stop [3] - 13:23, 28:10, 31:11
stored [3] - 12:5, 13:21, 19:8
stores [1] - 19:21
street [3] - 108:1, 133:3, 133:4
Street [6] - 4:11, 4:20, 5:3, 5:7, 5:10, 148:10
strictly [5] - 126:22, 127:1, 127:15, 127:25, 141:4
strike [14] - 7:25, 9:10, 13:9, 24:21, 29:25, 35:16, 38:11, 46:21, 51:2, 69:18, 74:23, 84:15, 90:4, 146:1
study [2] - 84:9, 84:17
subdivisions [1] - 116:4
subject [2] - 40:7, 64:23
submit [4] - 50:25, 85:18, 87:2, 105:24
submitted [2] - 20:24, 87:10
subsequent [1] - 54:23
subset [2] - 40:20, 40:23
subsidiary [1] - 18:7
substance [3] - 89:6, 89:18, 90:22
substantial [2] - 44:1, 44:10
suggest [2] - 109:20, 110:2
suggesting [1] - 111:10
Suite [6] - 4:11, 4:20, 4:23, 5:3, 5:10, 148:10
summary [4] - 72:5, 78:9, 78:12, 82:24
sup [1] - 60:25
supervisor [2] - 21:19, 60:8
supposed [9] -

105:16, 105:20, 105:21, 105:22, 106:17, 106:22, 118:3, 128:20
SVRS [137] - 11:18, 11:22, 12:2, 12:5, 12:10, 12:15, 12:22, 13:7, 13:13, 13:16, 13:25, 15:17, 15:19, 15:21, 15:23, 17:24, 18:1, 18:19, 19:8, 19:10, 19:15, 20:15, 20:22, 20:25, 21:5, 21:14, 21:20, 23:13, 23:16, 23:19, 24:8, 24:12, 24:19, 24:23, 27:1, 27:2, 27:17, 27:23, 27:24, 28:1, 28:9, 29:18, 30:2, 30:4, 30:18, 30:24, 31:2, 31:6, 31:7, 31:13, 31:16, 32:6, 32:14, 32:24, 33:10, 33:22, 34:5, 34:10, 35:20, 36:20, 37:2, 37:10, 37:11, 39:6, 39:12, 39:18, 47:8, 47:12, 48:20, 48:22, 48:25, 53:12, 53:16, 53:20, 54:1, 54:3, 54:14, 55:10, 55:17, 56:11, 56:14, 57:21, 57:23, 58:8, 59:10, 59:13, 60:14, 60:23, 61:13, 61:14, 61:18, 62:2, 62:23, 62:24, 64:8, 66:9, 66:20, 66:22, 68:15, 68:20, 68:23, 71:9, 74:25, 75:9, 79:9, 90:11, 95:24, 96:8, 97:10, 106:1, 118:9, 118:12, 120:18, 129:2, 134:14, 134:15, 134:16, 134:17, 134:18, 134:19, 134:20, 135:4, 135:8, 135:13, 135:15, 142:25, 143:4, 143:25, 144:7, 144:11, 144:12, 144:13, 145:3, 145:5, 145:7, 145:9
sworn [2] - 5:20, 148:13
system [23] - 9:23, 10:8, 11:4, 11:8, 11:10, 11:11, 14:22, 21:1, 26:7, 32:17, 41:15, 50:21, 64:10, 64:11, 66:20, 67:19,

100:13, 102:16, 105:24, 108:16, 119:16, 128:11
System [1] - 11:20
systems [2] - 19:23, 66:8

T

tab [1] - 33:23
table [2] - 6:23, 7:3
talks [1] - 67:11
tally [1] - 34:6
TAMMY [1] - 1:10
target [1] - 137:23
tasks [3] - 9:25, 10:7, 10:11
team [11] - 10:10, 10:12, 10:13, 14:13, 61:6, 62:6, 62:10, 62:11, 62:13, 90:10, 90:12
technical [24] - 6:13, 9:21, 10:9, 10:10, 10:12, 14:9, 14:13, 38:17, 38:18, 38:23, 38:24, 39:3, 39:9, 39:14, 39:17, 41:18, 45:13, 58:9, 58:20, 61:6, 62:6, 62:10, 126:12, 126:13
technically [1] - 77:7
Technology [2] - 42:12, 42:17
technology [1] - 64:4
ten [4] - 15:8, 15:11, 15:13, 15:15
Ten [3] - 4:11, 5:3, 148:9
term [4] - 25:8, 26:21, 43:4, 88:2
terminology [1] - 23:1
terms [13] - 13:7, 16:21, 17:10, 34:13, 38:24, 43:22, 82:20, 108:15, 108:17, 136:20, 136:21, 143:25, 144:11
terribly [1] - 7:12
terrific [1] - 9:5
testified [11] - 5:21, 18:13, 27:9, 27:15, 40:21, 46:1, 47:17, 92:22, 139:24, 140:2, 145:4
testify [4] - 8:21, 9:2, 43:9, 148:13
testifying [2] - 25:20,

40:15
testimony [4] - 13:24, 52:11, 69:1, 148:19
text [4] - 52:2, 112:3, 112:4, 121:2
texts [1] - 52:2
themselves [7] - 15:20, 17:17, 17:20, 20:10, 20:13, 31:7, 56:17
therefore [1] - 114:10
thereupon [1] - 148:16
they've [6] - 37:13, 53:19, 75:7, 116:9, 126:18, 130:12
third [12] - 55:20, 68:19, 69:2, 69:5, 94:7, 94:8, 108:22, 109:2, 109:4, 109:8, 120:18, 141:2
THOMAS [5] - 1:15, 1:16, 2:4, 2:14, 2:15
THYSSEN [1] - 1:8
TIGER [35] - 41:9, 41:11, 41:12, 41:21, 41:25, 42:9, 43:14, 43:16, 43:19, 44:11, 44:22, 44:24, 45:14, 46:11, 46:24, 67:6, 70:15, 74:10, 100:5, 100:14, 103:22, 111:12, 115:25, 116:13, 118:11, 119:17, 127:2, 127:16, 128:10, 129:14, 135:11, 135:12, 135:13, 141:5, 141:18
TIGER/line [1] - 45:12
timing [4] - 89:6, 89:12, 89:18, 90:22
TIMOTHY [2] - 1:16, 2:15
today [14] - 6:11, 6:14, 7:12, 7:16, 9:2, 16:5, 34:7, 34:13, 35:11, 35:18, 37:9, 59:23, 98:12, 98:20
today's [1] - 8:4
together [1] - 100:20
took [5] - 13:12, 13:14, 17:25, 19:2, 81:9
tool [4] - 42:11, 42:16, 56:21, 145:10
tools [4] - 27:2, 59:2,

135:16, 135:17
top [7] - 35:21, 85:19, 102:16, 116:13, 123:20, 136:11, 143:8
topic [1] - 91:12
topics [1] - 8:22
total [3] - 94:19, 95:8, 95:18
touching [1] - 148:14
toward [3] - 65:22, 68:12, 142:16
towards [1] - 64:5
town [23] - 48:1, 48:7, 48:15, 52:20, 53:4, 53:24, 72:9, 73:1, 73:12, 73:17, 73:22, 74:12, 74:15, 76:10, 77:13, 112:14, 112:16, 113:7, 113:13, 113:20, 133:25, 137:9, 139:1
towns [2] - 116:5, 116:8
track [6] - 11:13, 33:10, 34:11, 41:13, 48:23, 116:15
tracking [3] - 33:10, 33:13, 57:8
tracks [2] - 48:22, 132:17
tract [8] - 136:20, 136:22, 137:1, 137:2, 137:5, 137:7, 137:12, 137:23
tract/block [1] - 138:2
training [2] - 63:23, 64:3
transcript [3] - 3:18, 3:19, 3:24
transcription [1] - 148:18
transmit [1] - 51:4
transmitted [4] - 16:20, 16:22, 52:13, 94:4
TRAVIS [1] - 1:8
treated [2] - 54:17, 74:15
tried [1] - 79:24
true [7] - 57:11, 83:15, 108:20, 123:3, 124:3, 146:5, 148:19
truly [9] - 107:18, 107:21, 108:3, 108:5, 108:7, 108:21, 130:9, 132:5, 144:25
truth [3] - 115:15, 148:13, 148:14

16

try [2] - 22:25, 145:11
trying [9] - 7:18, 22:22, 89:16, 90:5, 106:15, 106:16, 107:20, 138:24, 141:22
turn [8] - 8:14, 8:16, 43:17, 51:16, 69:13, 90:25, 118:7, 121:4
turned [1] - 57:25
turning [2] - 59:9, 142:14
turns [1] - 36:25
two [24] - 8:10, 22:1, 22:2, 22:5, 22:8, 26:9, 67:10, 68:13, 78:11, 80:9, 81:14, 98:11, 100:1, 102:18, 113:14, 113:18, 115:14, 116:10, 122:15, 128:1, 128:5, 128:6, 128:12
two-page [1] - 78:11
type [18] - 11:15, 11:16, 11:23, 26:1, 26:16, 26:17, 34:16, 47:22, 57:13, 79:4, 79:20, 80:11, 104:9, 104:20, 104:25, 115:6, 122:19, 122:25
types [9] - 26:11, 41:14, 57:12, 81:18, 95:20, 104:4, 104:14, 106:4, 131:21
typewriting [1] - 148:17
typical [2] - 10:6, 11:14

U

U.S [2] - 12:24, 135:10
unavailable [1] - 26:3
under [30] - 10:13, 40:6, 48:7, 48:16, 49:2, 54:17, 54:21, 54:22, 55:10, 74:14, 77:13, 82:5, 84:2, 84:12, 85:5, 85:6, 96:1, 97:8, 110:20, 110:22, 112:5, 113:7, 118:8, 120:17, 140:23, 142:23, 143:12, 143:17
understood [2] - 13:6, 13:10

unique [1] - 137:6
unit [1] - 12:19
UNITED [1] - 1:1
United [2] - 4:6, 18:9
unless [2] - 7:5, 75:15
up [27] - 10:9, 10:17, 14:21, 21:16, 21:17, 21:18, 22:3, 36:15, 54:12, 59:16, 60:20, 60:21, 68:5, 99:3, 99:8, 110:7, 122:16, 126:20, 129:21, 134:13, 137:16, 138:6, 139:21, 140:7, 143:24, 144:2, 146:18
updated [7] - 18:8, 56:24, 71:5, 71:9, 74:25, 92:11, 96:8
updates [3] - 51:7, 51:13, 57:21
upload [4] - 23:8, 61:14, 62:19, 106:1
uploaded [4] - 16:24, 23:11, 24:11, 142:24
uses [3] - 42:18, 95:13, 144:1
USPS [3] - 13:17, 18:6, 57:3

V

VAN [1] - 5:9
VARA [1] - 2:9
VERA [1] - 1:4
verify [2] - 79:12, 132:4
version [1] - 27:24
versus [1] - 84:12
via [1] - 129:2
view [4] - 135:3, 135:14, 135:18, 135:24
viewing [1] - 136:5
Vilas [1] - 146:20
violated [1] - 120:19
violating [4] - 114:12, 114:21, 114:22, 115:1
visual [1] - 76:19
Voces [1] - 4:24
VOCES [1] - 2:8
VOCKE [2] - 1:16, 2:15
vote [1] - 12:8
voter [50] - 6:10, 6:14, 9:23, 10:8, 11:4, 11:7, 11:10, 11:13, 12:2, 12:10, 12:11,

12:25, 15:9, 15:23, 20:17, 23:20, 23:24, 24:16, 25:14, 26:9, 26:19, 30:1, 30:5, 30:8, 32:3, 32:10, 32:12, 32:17, 32:21, 40:24, 48:22, 54:21, 56:10, 62:4, 67:19, 107:14, 107:18, 107:21, 120:20, 124:24, 126:4, 126:16, 129:10, 130:8, 130:19, 131:10, 132:5, 132:24, 144:25
Voter [1] - 11:19
voter's [5] - 12:16, 20:18, 24:1, 107:23, 132:24
voters [88] - 12:4, 13:16, 14:24, 23:15, 23:17, 25:11, 25:25, 26:13, 26:21, 29:13, 30:19, 31:14, 31:24, 32:16, 32:23, 33:4, 33:7, 33:16, 34:4, 34:9, 34:14, 34:20, 35:13, 35:15, 35:19, 35:24, 36:13, 36:14, 37:9, 53:12, 53:21, 54:15, 54:21, 55:22, 56:22, 59:16, 61:16, 62:3, 63:10, 67:12, 69:24, 75:1, 75:10, 78:15, 79:3, 80:16, 80:20, 81:15, 82:1, 82:13, 82:16, 83:1, 83:2, 83:11, 83:16, 83:22, 84:10, 84:21, 85:1, 87:16, 87:22, 87:24, 95:23, 103:4, 103:8, 122:1, 123:8, 123:19, 123:21, 125:16, 130:15, 130:24, 131:4, 132:7, 132:17, 133:11, 133:13, 142:18, 142:22, 142:25, 143:9, 143:10, 143:17, 143:24, 144:4, 144:8, 145:8
voters' [2] - 25:4, 25:6
voting [3] - 11:5, 12:6, 121:13

W

waived [1] - 148:20
walk [2] - 7:21, 102:5

WARA [1] - 2:9
ward [78] - 21:8, 21:12, 21:23, 21:25, 22:1, 22:2, 22:4, 22:6, 22:8, 23:3, 23:5, 23:9, 23:14, 23:17, 23:19, 23:25, 24:3, 24:11, 31:19, 34:3, 42:19, 42:21, 50:14, 51:7, 54:11, 58:15, 59:3, 60:19, 60:23, 60:25, 61:14, 62:20, 62:22, 63:9, 64:24, 65:14, 65:15, 68:16, 69:14, 69:25, 70:4, 70:13, 71:1, 71:3, 71:5, 76:15, 81:10, 81:12, 86:21, 87:2, 87:11, 92:17, 93:9, 93:20, 94:4, 100:21, 101:4, 103:11, 103:12, 105:25, 108:18, 112:16, 115:17, 116:12, 116:14, 117:12, 122:12, 122:13, 123:14, 127:11, 134:22, 140:24, 143:6, 143:24, 144:21, 145:1
ward-based [13] - 51:7, 54:11, 60:19, 62:22, 63:9, 65:14, 65:15, 71:3, 81:10, 81:12, 123:14, 127:11, 143:6
wards [36] - 16:11, 21:15, 21:16, 22:13, 22:18, 22:19, 36:14, 36:15, 46:7, 50:1, 59:10, 59:12, 60:5, 60:7, 60:20, 60:21, 61:18, 100:12, 100:19, 101:1, 101:11, 101:16, 101:21, 102:8, 110:21, 114:6, 114:9, 114:17, 115:3, 115:22, 116:9, 119:22, 120:17, 138:14, 144:1, 146:2
Water [1] - 5:10
Waukesha [5] - 86:23, 86:25, 87:1, 138:1, 138:3
ways [2] - 17:11, 33:20
website [1] - 16:25
week [9] - 27:24, 30:25, 31:23, 32:19, 32:25, 51:11, 57:23,

79:10, 140:17
West [1] - 5:7
WGS84 [6] - 12:21, 17:8, 17:11, 17:15, 23:6, 61:8
wherein [1] - 4:3
whereof [1] - 149:3
whichever [1] - 132:17
Whitt [5] - 39:2, 39:4, 39:6, 46:17, 90:15
whole [3] - 126:25, 137:20, 141:21
Wisconsin [30] - 1:13, 1:20, 2:1, 2:12, 2:16, 4:4, 4:7, 4:10, 4:13, 4:20, 4:23, 5:4, 5:7, 5:10, 5:13, 5:14, 8:20, 12:11, 15:2, 30:1, 41:8, 42:24, 50:18, 69:9, 97:15, 137:6, 145:18, 148:6, 148:11, 149:7
WISCONSIN [3] - 1:1, 5:6, 148:1
wise [1] - 34:23
WISE [44] - 42:11, 42:15, 42:16, 42:24, 43:5, 64:10, 64:11, 67:6, 68:17, 68:22, 70:13, 77:24, 82:2, 82:14, 82:18, 84:3, 84:12, 85:5, 85:6, 85:10, 100:13, 100:25, 102:7, 102:11, 102:14, 102:16, 103:11, 108:12, 108:18, 111:5, 122:3, 122:14, 123:9, 124:5, 124:6, 127:2, 127:12, 127:16, 128:10, 141:5, 141:18, 142:20, 143:7, 143:13
WISE-LR [44] - 42:11, 42:15, 42:16, 42:24, 43:5, 64:10, 64:11, 67:6, 68:17, 68:22, 70:13, 77:24, 82:2, 82:14, 82:18, 84:3, 84:12, 85:5, 85:6, 85:10, 100:13, 100:25, 102:7, 102:11, 102:14, 102:16, 103:11, 108:12, 108:18, 111:5, 122:3, 122:14, 123:9, 124:5, 124:6, 127:2, 127:12, 127:16, 128:10,

17

141:5, 141:18,
142:20, 143:7, 143:13
 wit [1] - 148:12
 withdraw [1] -
131:16
 Witness [1] - 3:2
 WITNESS [1] - 63:16
 witness [4] - 4:1,
5:20, 148:19, 149:3
 wondering [1] -
36:18
 word [2] - 69:17,
69:19
 words [5] - 32:22,
44:9, 63:3, 66:24,
143:11
 works [1] - 10:13
 write [11] - 112:1,
112:2, 112:25, 113:1,
113:24, 113:25,
120:25, 121:1,
121:23, 121:24, 128:7
 writing [1] - 129:8
 written [2] - 82:21,
130:3

Y

 yards [1] - 100:2
 year [3] - 15:5, 64:7,
81:3
 years [4] - 15:8,
15:11, 15:13, 15:15
 yellow [2] - 134:5,
134:6
 yield [1] - 142:12

Z

 zip [1] - 18:5